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Contact CEH NORA team at
noraceh@ceh.ac.uk

1 **Replication, effect sizes and identifying the biological impacts of pesticides**
2 **on bees under field conditions.**

3

4 Woodcock, B.A.¹, Heard, M.S.¹, Jitlal, M.S.¹, Rundlöf, M.², Bullock, J.M.¹ Shore, R.F.³ & Pywell,
5 R.F.¹

6

7 1. NERC Centre for Ecology & Hydrology, Maclean Building, Crowmarsh Gifford, Wallingford,
8 Oxfordshire OX10 8BB, UK. Tel. +44(0)1491692415

9 2. Lund University, Department of Biology, 223 62 Lund, Sweden.

10

11 3. NERC Centre for Ecology & Hydrology, Library Avenue, Lancaster Environment Centre, Lancaster,
12 Bailrigg LA1 4AP

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26 **Summary (150 words)**

- 27 1. Honeybees have worldwide importance as crop pollinators. To ensure their
28 persistence in agricultural systems statistically robust field trials of plant protection
29 products are vital.
- 30 2. We consider the implications of regulations from the European Food Safety Authority
31 that require the detection of a 7 % effect size change in bee colony sizes under field
32 conditions.
- 33 3. Based on a power analysis, we argue that the necessary levels of replication (68
34 replicates) may pose practical constraints to field testing.
- 35 4. *Synthesis and applications*: Regulatory studies benefit from data sources collated over
36 a range of spatial scales, from laboratory to landscapes. Basing effect size thresholds
37 solely on expert judgement, as has been done, may be inappropriate. Rather definition
38 through experimental or simulation studies that assess the biological consequences of
39 changes in colony size for bee populations is required. This has implications for
40 regulatory bodies outside the European Union.

41

42 **Key words:** bumblebees, experimental design, honeybees, neonicotinoids, pollinators,
43 statistical power testing, regulatory risk assessment.

44

45 **Introduction**

46 The agricultural sector relies heavily on chemical pesticides to protect crops from a wide
47 range of pests (Tilman *et al.* 2001; Oerke 2006). The safe use of these pesticides depends
48 upon robust and effective risk assessments that balance the need to support food production
49 while protecting the environment and supporting ecosystem processes (EFSA 2013). As

50 domesticated and wild bees have high risks of exposure to pesticides in agricultural systems,
51 regulatory risk assessments protect both their biodiversity and contribution to crop production
52 through pollination (Gallai *et al.* 2009; Potts *et al.* 2010; EFSA 2013; Vanbergen *et al.* 2013).
53 If the evidence provided by these risk assessments is to be robust then experimental designs
54 need to reduce to agreed acceptable levels the likelihood of failing to reject a false null
55 hypothesis, specifically a Type II statistical error whereby a real effect of a pesticide on a bee
56 population is not detected due to insufficient experimental replication (EFSA 2013). The
57 more variable systems are, or the smaller the effect sizes (the difference between pesticide
58 and control treatments) to be detected, then the greater will be the need for replication to
59 detect these differences reliably (Cresswell 2011; EFSA 2013). This Policy Directions paper
60 aims to examine the practical implications associated with European Food Safety Authority's
61 (EFSA) guidance on addressing this issue and the implications that it has for future field and
62 landscape scale evaluations of pesticide impacts on bees.

63 The regulatory basis of pesticide risk assessments for bees have developed over many
64 years from *ad hoc* combinations of laboratory, semi-field (e.g. tented colonies such as those
65 described in Colin *et al.* 2004) and field-based evaluations (EFSA 2013; Medrzycki *et al.*
66 2013). These studies aimed to identify the consequences of a wide variety of mechanisms of
67 exposure to pesticides, including direct contact, consumption (pollen, nectar and in water)
68 and impacts from pesticide metabolites (EFSA 2013). Laboratory assessments of acute oral
69 and contact toxicity (e.g. LD_{50} tests) have historically represented the cornerstone of this
70 process, and are based on well-established fixed protocols developed by regulatory bodies
71 (OECD 1998a, b; EPPO 2010; CEB 2011). For example, LD_{50} mortality protocols require the
72 use of a control (e.g. untreated sugar), a known toxic reference and a test compound applied
73 at five doses; each replicated at least three times (OECD 1998a, b; EPPO 2010; CEB 2011).
74 Although such experiments provide robust estimates of pesticide toxicity, their focus has

75 been on acute mortality effects of individual bees identified over short time periods, e.g. 48
76 hours. These assessments do not take into account additive effects that may result from
77 chronic sub-lethal impacts of pesticide exposure over extended periods of time on colonies
78 (Cresswell 2011; EFSA 2013) or the potential effects of exposure to multiple pesticides (e.g.
79 Gill, Ramos-Rodriguez & Raine 2012; Johnson *et al.* 2013; Williamson & Wright 2013).
80 Over the last decade risk assessment practices within the European Union have been widened
81 to include assessments of not only acute oral and contact toxicity on individual worker bees
82 (e.g. OECD 1998a, b), but also assessments of colony level impacts resulting from repeated
83 or chronic exposure (EFSA 2013; Medrzycki *et al.* 2013).

84 A more recent requirement has been the use of field-based studies that allow more
85 realistic behavior of bees to be considered (EFSA 2013). This is especially important for
86 eusocial species that have potentially large foraging ranges and so are capable of utilizing
87 spatially complex foraging resources over large areas (Mommaerts *et al.* 2010; Potts *et al.*
88 2010; Kennedy *et al.* 2013; Vanbergen *et al.* 2013). For such colony-level processes these
89 field-based studies have been crucial for quantifying the impacts of pesticides on population
90 viability, pollination services and yield of hive products like honey (EFSA 2013). While
91 standardised laboratory conditions make regulatory testing tractable, field-based studies are
92 far more susceptible to the inherent variability across both space and time found within real-
93 world systems. Even for domesticated species (e.g. honeybees), replicate colonies can show
94 dramatic differences in growth and survival under almost identical conditions (Cresswell
95 2011; Pilling *et al.* 2013; Godfray *et al.* 2014; Godfray *et al.* 2015; Lundin *et al.* 2015). Using
96 a systems model approach, Bryden *et al.* (2013) demonstrated that in the case of bumblebees
97 sub-lethal stress (linked to factors like neonicotinoid pesticide exposure) may be the
98 underlying drivers that variability in colony success. Unfortunately, this variability
99 represents a potentially serious problem with regulatory testing. Cresswell (2011) found that

100 of four field or semi-field studies investigating impacts of neonicotinoid pesticides on
101 honeybees, only one had sufficient replication to detect changes in honeybee performance of
102 less than 33%. Using already known measures of variability from previous studies this
103 problem can be addressed by the use of *a priori* power analyses to predict the experimental
104 replication necessary to detect a specified effect size between control and pesticide
105 treatments. This represents not only a quantitative way of determining the feasibility of a
106 field experiment, but is also a regulatory requirement used to ensure conclusions
107 underpinning regulatory decisions are statically robust (EFSA 2013).

108

109 **Statistical power for field-based experiments in the EU**

110 To address this problem EFSA have stipulated that field-based studies investigating the
111 impacts of pesticides on bees must have sufficient replication to detect a 7% change in colony
112 size in response to pesticide exposure with a fixed 80% probability (often referred to as
113 statistical power, $1-\beta$) and a significance level of $\alpha=0.05$ (EFSA 2013). Note that for bee
114 mortality, detection of larger effect sizes are deemed acceptable (Khoury, Myerscough &
115 Barron 2011; EFSA 2013). While field studies provide crucial information about the
116 responses of bees under biologically realistic conditions their resource intensive nature has
117 meant that they are not typically a standard requirement in regulatory risk assessments (EFSA
118 2013). However, principals for their implementation are laid out in the recent regulatory
119 framework given by EFSA (EFSA 2013).

120 Using expert opinion ESFA have argued that a 30% reduction in colony size (termed
121 a 'large' effect size) would result in a loss of honeybee colony viability, while a less than 7 %
122 reduction (described as a 'small' to 'negligible' change in colony size) would have no effect
123 (EFSA 2013). Although these assessments were based on honeybees, it is worth considering

124 their relevance to bumblebees. Whitehorn *et al.* (2012) suggested that for *Bombus terrestris*
125 thresholds in colony sizes are likely below which queen production (the key predictor of
126 reproductive potential) will not occur. This potentially non-linear relationship would make it
127 hard to predict the impact of a 7 % decrease in colony size and so the relevance of this
128 threshold for bumblebees is probably not the same. However, the detection of this 7 % effect
129 size currently represents the minimum threshold for detecting population level changes in
130 regulatory field studies for honeybees (EFSA 2013).

131 Under controlled laboratory conditions the reliable detection of 7 % effect sizes on
132 bees would be likely to be more feasible as much of the inherent variability of natural
133 systems is removed. However, in the context of field-based studies on honeybees (or other
134 model bee systems like *B. terrestris*) such a detection goal represents a major challenge due
135 to the high levels of replication required to counter between site and inter-colony variability
136 (Cresswell 2011). To date the practical implications of achieving this regulatory detection
137 goal are only recently being considered (EFSA In press).

138

139 **Practical considerations and replication in field-scale experiments**

140 Applying the power analysis approach outlined by EFSA (2013) on data from a large-scale
141 field experiment investigating the impact of the neonicotinoid pesticides (clothianidin) on
142 honeybees (Rundlöf *et al.* 2015), we find that 68 replicates of treated and control sites would
143 be required to detect a 7 % change in colony size (Supporting Information Appendix S1).

144 Such a power analyses would ideally be undertaken using data relevant to the regional
145 location of the regulatory study. Further, the Rundlöf *et al.* (2015) study assess colony size
146 using the widely used visual based Liberfeld approach. More advances computer based
147 methods to estimating colony strength may well reduce estimates of between colony

148 variability and so the sample size required to detect a 7 % effect size (Wang & Brewer 2013).
149 Independent of these caveats, implementing such a large-scale field experiment with
150 sufficient replication to detect a 7% effects size change would be challenging from a practical
151 perspective. Even using relatively small areas of treated crop (i.e. the 1-2 ha suggested by
152 EFSA 2013) establishing 68 replicate blocks would be complicated where spatial separations
153 of 2-4 km between experimental sites are needed to reduce the probability of cross-
154 contamination by foraging bees (EFSA 2013; Cutler *et al.* 2014; Rundlöf *et al.* 2015).
155 Simply achieving uniform agronomic management across so many spatially separated sites,
156 each operated by different farmers, would also be hard to achieve. In addition, such small
157 areas of treated crop (<2 ha) do not reflect real-world agricultural practices where mass
158 flowering crops are often planted in larger homogeneous blocks (>50 ha). Rundlöf *et al.*
159 (2015) in Sweden used more realistic average field sizes of 8.9 ha; however, even these may
160 be relatively small compared to cropping regimes in many countries. An experiment at this
161 scale would require not only the planting, but also the necessary licensing, to sow over 605 ha
162 (e.g. 8.9 ha × 68 replicates) of treated crop. Crops treated with unlicensed pesticides (i.e.
163 which are being risk-assessed prior to any licensing) may well be unsuitable for
164 incorporation into the food chain and would need to be disposed of in an appropriate manner
165 (HSE 2015). It is also quite possible that the public, NGOs concerned with conservation and
166 regulatory authorities with other remits (e.g. water quality) may also object to testing of
167 unlicensed chemical compounds on this scale. There is precedent for such problems in the
168 case of genetically modified crops where wide scale public resistance to testing was seen in
169 the UK (de Krom, Dessein & Erbout 2014).

170 As the use of pesticides remains crucial to maintaining crop yields there is also an
171 economic case for questioning the appropriateness of this level of replication (Tilman *et al.*
172 2001; Oerke 2006). For example, field studies of a comparable scale (60 replicates) have

173 been undertaken in the past – for the Field-Scale Evaluations of genetically modified crops
174 in the UK (Perry et al. 2003) – but have been criticized as being prohibitively expensive and
175 so unsuitable for being repeated as a matter of routine for other crop protection products (Qi
176 *et al.* 2008). These issues are certainly acknowledged by EFSA who are currently
177 considering the increased use of systems based modelling approaches at the cost of field scale
178 testing for the assessment of impacts on honeybees (EFSA In press). Should field studies be
179 used the likely cost linked with this level of replication are high. This can be seen in an
180 ongoing study (see [http://www.ceh.ac.uk/our-science/projects/impacts-neonicotinoids-](http://www.ceh.ac.uk/our-science/projects/impacts-neonicotinoids-honeybees)
181 honeybees) from which we calculate that the replication necessary to detect a 7 % change in
182 bee colony sizes would cost upwards of €10.3 m *p.a.* (assuming costs of €75.7 k per site, see
183 Supporting Material Appendix S2). These costs also assume only a single study year,
184 something that is likely to be less than ideal where long term effects of pesticides may have
185 chronic effects. For example, using a systems model approach Becher *et al.* (2014)
186 demonstrated that changes in honeybee colony sizes following exposure to neonicotinoid
187 pesticides would only be detectable after five years. The use of studies across multiple years,
188 while being biologically more meaningful, would add significantly to the cost of this research
189 (e.g. €1.5 million for a five year study). Given that the development costs of a typical plant
190 protection product are estimated at €40m (McDougall 2010), such an increase to satisfy only
191 one part of a regulatory process may impact the commercial development of some
192 compounds.

193

194 **Conclusions**

195 If we are to sustainably feed a rapidly growing global population then agriculture will
196 need to become increasingly intensive, while simultaneously limiting its impact on
197 biodiversity (Oerke 2006; Bruce 2010; Godfray *et al.* 2010). The development of a new

198 generation of effective but environmentally safe pesticides represents one of several
199 approaches that may contribute to supporting future crop yields. To assess and minimize
200 risks to the environment, pesticide regulatory frameworks may increasingly need to use
201 information across a range of spatial and temporal scales. Importantly, risk assessment may
202 need to use field trials that determine the long-term impacts (>1 year) of exposure on species
203 and populations. Due to a non-linear relationship between effect size and replication the
204 detection of 15 % and 20 % changes in colony size would require considerably lower levels
205 of replication (respectively 13 and 7 replicate blocks, Fig. 1, Supporting Information
206 Appendix S1). If the detection of alternative effect sizes retain biologically meaningful
207 information about the impacts of plant protection products then such field studies may have
208 an economically viable part to play in the future regulatory framework. While we strongly
209 endorse the need for power analysis, we suggest that a ‘one size fits all’ effect size of 7 %
210 therefore need to be further justified by informed debate supported by experimental evidence.
211 Considering the case of pesticide impacts on bees we suggest that a more cost-effective and
212 biologically meaningful strategy for regulatory testing would be to follow a process that
213 included the: i) use of experimental and simulation modelling approaches to define
214 biologically meaningful threshold effects for bee population persistence in field experiments;
215 ii) use power testing to determine the level of replication required to identify reliably these
216 lower detection goals; and iii) utilise the savings in resources to examine the impacts of
217 pesticides over a number of years rather than in a single year.

218 Ultimately studies need to be fit for purpose in terms of their ability to detect
219 population changes, while being realistic in terms of practical implementation. Other
220 complementary sources of evidence may also support and inform the regulatory process,
221 further strengthening experimental field assessments of pesticide impacts on bees. For
222 example, well designed and geographically targeted pollinator monitoring schemes (e.g.

223 Defra 2014) could provide early warnings of long-term, sub-lethal impacts of pesticides on a
224 wide range of other wild bee species. Importantly this would extend long term assessments
225 beyond the limited number of species (e.g. *Apis mellifera*, *B. terrestris* and *Osmia bicornis*)
226 currently suitable as model systems. Indeed, analysis of monitoring data has recently
227 provided evidence of negative associations between pesticides and long-term demographic
228 trends on taxa other than bees (e.g. Hallmann *et al.* 2014). Large scale field based
229 assessments are always likely to remain costly and so would only represent a final stage in
230 the regulatory process. However, field scale studies identifying the impact of pesticides
231 provide key validation under real world conditions that may identify unforeseen
232 consequences resulting from unanticipated environmental stresses on bee populations (e.g.
233 Gill, Ramos-Rodriguez & Raine 2012). Such studies in our opinion are therefore a crucial
234 component of the regulatory framework.

235

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243

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354 **Supporting Information Appendix S1.** Simple power analysis to determine replication for
355 field-based studies identifying the effect of pesticides on honeybees.

356 **Supporting Information Appendix S2:** Derivation of the predicted costs of field scale
357 evaluations of honeybees for regulatory studies.

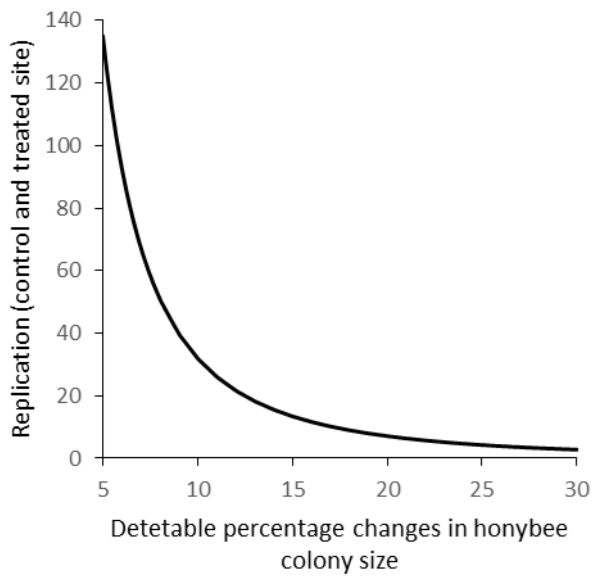
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359 **Figure captions**

360 **Fig. 1.** Relationship between experimental replication (control and pesticide treated field
361 sites) and the detectable changes in honeybee colony (total number of bees) effect size based
362 on power equations presented by EFSA (2013). For each effect size this the replication
363 required to detect a response with a fixed 80% probability and a significance level of $\alpha=0.05$.
364 See Supplementary Material S1 for full details.

365

366 Fig. 1



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