

Wildlife and Countryside Link response to Defra's consultation on the National Pollinators Strategy

Wildlife and Countryside Link brings together 43 voluntary organisations concerned with the conservation and protection of wildlife, countryside and the marine environment. Our members practise and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and marine environment and biodiversity. Taken together our members have the support of over eight million people in the UK and manage over 750,000 hectares of land.

This response is supported by the following 12 Link members:

- Amphibian and Reptile Conservation
- Badger Trust
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation
- Friends of the Earth England
- The Mammal Society
- National Trust
- Plantlife
- Royal Society for the Protection of Birds
- Wildfowl & Wetlands Trust
- The Wildlife Trusts
- Woodland Trust

1. Do you have any comments on the vision and aims for pollinators (in Chapter 2)?

Link welcomes the development of a National Pollinator Strategy (NPS) and has a number of suggestions on how the draft could be strengthened.

We feel that the strategy does not do enough to promote additional action on the ground. While we welcome the actions on improved monitoring and communication of pollinator needs to different sectors, these actions on their own will not be enough to deliver the necessary improvements for pollinators. We have made specific suggestions below.

Monitoring should include not only monitoring of pollinator populations, but also of the resources they need; for example area of flower-rich and semi-natural habitat. This is vital to improve our understanding of what is driving changes in pollinator populations, and highlighting where further action is needed.

The strategy as it currently stands does not clearly communicate a desire to create coherent and resilient ecological network of habitats to support and benefit pollinators. To do this the strategy should clearly align itself to deliver high quality habitats, and also to the *Biodiversity 2020* strategy as well as the Natural Environment White Paper and *Making Space for Nature*. The strategy should clearly aim to achieve bigger, better, more and joined up habitats for pollinators, resulting in more sustainable pollinator populations, with greater resilience in face of climate change. Recommended amendments to strategy aims are outlined below:

- **Bigger, better managed and more connected** diverse flower-rich and semi-natural habitats to support our pollinators on farmland and public land, in towns, cities and gardens, along transport networks and on land surrounding other infrastructure such as water treatment works and flood defences; - this should include nesting/shelter not just flower-rich as many pollinators have complex lifecycles.
- **Sustainable, robust (resilient to environmental change) and increasing populations of** bees and other pollinators to support pollination services; **and also ensure no extinction of pollinator species**;
- Enhanced awareness **and evidence of action** across a wide range of businesses, other organisations and the public of the actions they can take to support pollinators.

Link is pleased that the draft NPS recognises the importance of all pollinator species. We recognise that bees can be a media-friendly flagship for other less charismatic species but ask Defra to ensure that the actions and associated guidance take account of the needs of all pollinators.

There is one significant area of pollinator conservation and pollinator importance that Link feels has been overlooked by the strategy, which is pollinators that are threatened with extinction and so are of high conservation priority. A recent IUCN study found that 24 per cent of European bumblebees are threatened with extinction.¹ There are 199 species of pollinator on the England NERC Section 41 list, including for example 5 *Bombus* (bumblebee) species; and others on the IUCN Red List. The importance of these species should be acknowledged by the strategy, for maintaining species diversity, as well as genetic and functional diversity of pollinators in the UK.

An additional overall aim of the strategy should be to prevent any further pollinator extinctions and so maintain a rich and diverse community of pollinators; allowing pollinators to be reactive and resilient to environmental changes. The specific management requirements and information regarding these species (much of this information has been collated by NGOs already) should be embedded within the information and the calls to action provided to land managers, particularly farmers (via agri-environment schemes) and large-scale land managers, as well as brownfield managers as some brownfield sites are havens for rare and threatened pollinator species.

¹ <http://www.iucn.org/?14612/Bad-news-for-Europes-bumblebees>

2. Have we given a fair summary of main areas of concern for pollinators and the available evidence, or are there further issues you want to identify (in Annex 1)?

Link welcomed the thorough methods of assessing issues of concern which are presented in the document 'Status and value of pollinators and pollination services'. This comprehensive piece of work has made good use of evidence and has been well presented, setting the scene for the strategy. However, we feel that there are a number of factors that still need addressing:

- We believe that there is a paucity of information, and assessment of evidence, on species of conservation priority (section 41 and/or red listed). We would recommend that a short document on these species is researched and written. Collating and presenting these important species issues and needs would complement the existing report and will ensure that the needs of these species are properly understood and so effectively incorporated into any actions resulting from the strategy.
- Link agrees that agricultural land use and pesticide use are drivers of declines in pollinator populations. We believe that improved standards and uptake of Integrated Pest Management (IPM) will be key to addressing these drivers and making farming more pollinator-friendly.
- We feel there is a lack of consideration of pesticides other than neonicotinoids. Recently the assessment methods for pesticides to assess non-target impacts on pollinators have been improved and this has indicated that there has been a lack of appropriate methods to assess impacts particularly on wild pollinators; testing has only really been adequate for honey bees. This fact needs to be acknowledged and surveillance methods applied, to look for pesticide impacts on pollinators, and take action to prevent these impacts if necessary. It also needs to be acknowledged that a wide range of chemical applications can affect pollinators indirectly, particularly broad spectrum herbicides which remove wild flowers from the landscape.
- To reverse pollinator declines it will be essential to protect and enhance existing habitat, particularly the remaining areas of semi-natural habitat, across all landscapes. We do not feel that adequate focus has been given to habitat loss and decline in habitat quality as drivers of pollinator decline in the NPS.
- The proposed actions on monitoring focus only on pollinators themselves, not on monitoring the provision of resources pollinators need (for example flower-rich habitats). This should be included within the NPS and it may be possible to draw on existing work, for example the new National Plant Monitoring Scheme being run in partnership by Plantlife, BSBI, CEH and funded centrally through JNCC, to provide this information.

- More generally, while Link welcomes the emphasis given to research and monitoring, we wish to highlight that we already have sufficient information to guide effective ‘no regrets’ actions. The NPS needs to insist on urgent action that needs to be taken without delay or the further research.
- It is vital that any measures to enhance crop pollinators are screened for their impact on the plethora of other pollinators (the 1,500 species mentioned). For example, the current recommendation for wildflower field margins, and pollen and nectar mixes, is to cut each autumn. This removes all the breeding habitat for many butterflies and other pollinators which may be overwintering high up on vegetation. Thus management that is suitable for bees (which tend to overwinter underground in holes) may not be compatible with the requirements of other pollinators.

3. Do you have any suggestions on the best ways to communicate the ‘Call to Action’ (once agreed) to many different audiences (in Chapter 3)?

Link supports the idea of a ‘Call to Action’, although as we have not seen it to date we are not able to comment on the content. The messages will clearly need to be tailored to different sectors, and each sector will need access to trusted advice and suitable expertise. In some sectors this may create challenges, for example Local Authorities increasingly lack in-house ecological expertise. There may also be a need to tailor messages locally, particularly where there are rare or range-restricted species with particular habitat requirements. It must be recognised, however, that merely supplying people with information will not be enough to stimulate action in all sectors.

There is clearly a significant level of interest among the general public in helping pollinators. Gardeners are one audience for which simply providing information may deliver real results for pollinators on the ground. The University of Northampton produced a case study in 2013² exploring the impacts of the BBC television series ‘Bees, Butterflies and Blooms’ on public awareness of pollinator declines. They found that this programme, along with planting recommendations such as the Royal Horticultural Society’s ‘Perfect for Pollinators’ list, had been successful in raising awareness of pollinator declines. Many garden centres surveyed felt that media interest in pollinator declines had stimulated demand for ‘pollinator friendly’ garden plants. It is important not to over-simplify messages: for example gardeners may easily grasp messages about having more flowering plants for pollinators, but other needs like food plants for caterpillars and undisturbed ground for hibernating bees may not be met.

² The impact of academic involvement in popular conservation campaigns: a “planting for pollinators” case study. Dr Hilary Erenler and Professor Jeff Ollerton. Unpublished report, University of Northampton 2013

Other sectors may be less open to taking up the 'Call to Action', or there may be specific barriers to overcome. For example managers of public spaces may have preconceived ideas about 'tidiness'³ which lead them, for example, to use weedkiller and keep grass swards short. Many Local Authorities have made cuts to budgets for managing green spaces and may need help and advice to implement the Call to Action in affordable ways.

Evidence shows that high quality advice and training is key to the successful delivery of environmental measures⁴. Link therefore believes that Government should place a high priority on effective communication with farmers to achieve the objectives of the National Pollinator Strategy. Making information available, including online, is important but not sufficient in itself: tailored advice and face to face contact are more effective methods of securing behaviour change. Good advisers are key to getting farmers to 'own' the aims of environmental measures and they make a huge positive difference to environmental outcomes. They can often be important 'gatekeepers', providing links between farmers and local communities. It is not surprising then that all the evidence suggests that farmers welcome high quality, consistent advice in this area, when they are offered it. Link therefore urges Government to ensure that Natural England and others are adequately resourced to provide independent advice to farmers on helping pollinators as part of their roles.

Link believes that it is vital to engage with farmers at the start of their careers via Agricultural Colleges, as well as through on going professional development via assurance schemes and associated training, to help imbed good practice in the industry. Government could explore whether the Call to Action could be integrated into agricultural training programmes.

Link members look forward to continuing to work with Defra as the details of implementing this strategy are developed.

4. Do you agree with the priority actions in Chapter 3?

There needs to be an indication within the strategy of how success will be measured. Monitoring and assessment must be embedded within all action resulting from the strategy. Details on exact measures of success and collation of this information, for example in relation to the monitoring scheme etc., should be in the implementation plan. However the strategy should clearly state the need for identifying and monitoring of on the ground indicators of success, with partners and lead partners, and consider what these might look like. For example within the Campaign for the Farmed Environment (CFE) or the New Land Management Scheme (NELMS)

³ See Liverpool Landlife <http://www.wildflower.co.uk/>

⁴ See for example: Natural England Evidence Synthesis Paper (2013) Evidence for New Environmental Land Management Scheme (NELMS) Design. http://www.naturalengland.org.uk/Images/nelms-evidence-synthesis-paper_tcm6-36208.pdf and RELU (2012) Improving the success of agri-environment initiatives <http://www.relu.ac.uk/news/policy%20and%20practice%20notes/37%20Bullock/PPN37.pdf>

the uptake of key agri-environment options or packages for pollinator-friendly habitat could be monitored.

Link welcomes the emphasis on partnership working between government, industry and civil society. However, we are concerned that many of the proposed actions relate to disseminating information to different sectors, with less focus given to how government can ensure delivery on the ground for example by providing incentives or funding, or enforcing regulation. We ask Defra to consider what additional resource government will make available to deliver the aims of the NPS, and to set out what measures government will take if the voluntary approach fails to deliver improvements to pollinator populations.

- *Priority Action 2: Ensure pollinators represent a key focus of CAP reform.*

Link believes that this is a key action and feels it needs to be strengthened. Decisions currently being taken by Ministers, in particular on the NELMS, greening and cross compliance, will be critical in determining to what extent CAP reform is part of the problem or part of the solution to pollinator declines. We urge the NPS Defra team to continue to work closely with their colleagues in the CAP implementation sections of Defra to secure good outcomes for pollinators.

Link is engaging closely with the stakeholder consultation process on CAP reform. We set out our position in our consultation response of November 2013. In this response we emphasised the importance of a targeted, well-funded and well-designed agri-environment scheme, complemented by effective greening in the wider countryside, and a coherent package of support for High Nature Value farming. We believe that these measures are critical to ensure that the CAP delivers for pollinators, and hope that the remaining decisions to be made on CAP implementation will reflect government's commitment to pollinators.

Link members are engaged in discussion with Natural England and Defra about design and targeting of the NELMS. We believe that NELMS has the potential to deliver significant benefits for pollinators. Scheme agreements need to deliver resources for a range of pollinators over their whole active season. Standard pollen and nectar mixes alone will not achieve this (they often provide resources only during a short period over the summer and mainly include plants accessible to bumblebees, not other insects): they need to be complemented by land management that allows native and local wild plants to thrive. Further guidance on this topic has been provided by Plant Link UK and Invertebrate Link⁵ and Plantlife's keeping the wild in wildflower policy⁶. Link is concerned that of the proposed measures for pollinators in the mid-level, NELMS geographic-tier, only one (low input grassland) is applicable to livestock farming.

⁵ Creating habitat for pollinators in Britain & Ireland. Plant Link UK and Invertebrate Link, 2011. http://www.plantlife.org.uk/uploads/documents/Planting_For_Pollinators_Statement.pdf

⁶ Keeping the wild in wildflower, Plantlife, 2014. http://www.plantlife.org.uk/uploads/documents/PL_Seeding_14.pdf

Link believes that measures for maintenance of species-rich grassland need to be included in the landscape scale scheme as well as in the higher tier.

Given that the NELMS is only expected to cover 35 – 40% of the farmed area, there is a clear need for other greening and cross compliance to support pollinators across the rest of the landscape. We continue to believe that a National Certification Scheme is the most effective way to deliver Greening that would be most beneficial to pollinators, and urge Government to review the implementation of Greening in England at the earliest opportunity.

The important role of cross compliance has been omitted from the draft NPS and should be added. Cross compliance rules currently include the protection of Natura 2000 sites, Sites of Special Scientific Interest and landscape features including hedgerows, as well as contributing to the enforcement of Environmental Impact Assessment Regulations. Although the new GAEC framework no longer makes specific reference to habitats, Link believes that it can and should continue to provide strong protection for habitats and species. We have commented in detail on this topic in our response to Defra's informal consultation on implementation of the new GAECs⁷. We included in this response a specific recommendation that the GAEC on hedgerows should include a provision for multi-annual cutting, to replace the current option in Entry Level Stewardship. This would make a strong contribution to helping pollinators in areas of farmland not targeted by NELMS.

- *Priority Action 3: Secure commitment from providers of advice to farmers to draw on 'Call to Action' package.*

Link feels that this needs to be strengthened. What is the specific outcome expected from this action? We also ask Government to clarify what resources will be made available to support advice provision by government bodies and others. Good, knowledgeable advisors are key to helping farmers deliver high quality habitats. See also our response to question 3.

- *Priority actions 5 & 7: Integrated Pest Management.*

Link welcomes the recognition of the importance of IPM in the National Pollinator Strategy. However, as set out in our response to the UK National Action Plan on Pesticides, Link believes that Government's current approach does not go far enough to secure IPM implementation by UK farmers. We continue to emphasise through our engagement with the Pesticides Forum that we feel government and industry need to step up efforts on IPM. We have called on government and industry to develop a clear definition of IPM that builds on the principles set out in the Sustainable Use Directive; develop crop and sector-specific IPM protocols; provide extension and outreach services to assist farmers in implementing IPM; and incorporate mandatory training in IPM for all sectors into existing assurance schemes. Link believes that the NPS should set out actions on IPM that are additional to existing commitments.

⁷ http://www.wcl.org.uk/docs/Informal_cross_compliance_consultation_Link_response_Mar14.pdf.

- *Actions on management of towns, cities and public land*

We welcome the aim in the draft NPS to work with partners to deliver a step change in land management from 2014 to improve pollinators' access to habitat and essential resources in towns, cities and public land. It will be important for the NPS to draw on the experience of initiatives around the country to identify barriers to implementation and identify Defra's role in overcoming those barriers. One concern raised by the Association of Local Government Ecologists is the lack of ecological expertise in local councils – we strongly urge Defra to consider how to ensure that local councils have access to the right expertise.

There are no specific actions in the draft NPS to ensure that planning policy plays its part in delivering an increase in pollinator habitat. Link feels this is a significant gap. Habitat loss - often to insensitive development - is a major cause of pollinator decline. More clarity is needed in the NPS on how the planning and development of land affects pollinator habitats and on how the current planning system can better protect pollinators. New developments must protect existing pollinator habitat and ensure any losses of pollinator foraging and nesting habitat are adequately compensated for locally, thus ensuring there is no loss to the functional network of pollinator resources in the area. This is absent from the draft - it should be a priority action.

Local authorities will also need clearer guidance on how to assess the value of brownfield sites for wildlife – planning policy favours development on brownfield sites but they can be very important for pollinators. Given the loss of ecological expertise at local authority level there is a real risk that valuable habitats could be lost when damage could have been avoided or habitat incorporated into a good quality development.

The planning system can also play an important role in protecting key pollinator sites. Guidance is required for developers and planners to ensure that key pollinator sites are recognised and protected. Key sites should be afforded appropriate protection through SSSI notification or Local Wildlife Site/Site of Importance for Nature Conservation designation, with no prejudice between greenfield and brownfield sites.

The Department for Communities and Local Government (CLG) should develop best practice guidance for bees and pollinators in its Planning Practice Guidance on Natural Environment and ensure that Local Plans produced by local planning authorities meet the Government's aims - as set out in the National Planning Policy Framework - to deliver gains for nature.

- *Issues not adequately covered by the draft priority actions*

Protection of existing habitats: Link feels that this is a critical gap in the current draft. Protection of England's remaining semi-natural habitats urgently needs to be strengthened, including through better implementation and enforcement of the Environmental Impact Assessment

regulations⁸, further designation of SSSIs where appropriate, and increased investment in bringing SSSIs into good condition. Reversing declines in pollinators will require protecting and restoring existing habitat as well as pollinator-friendly planting in arable margins and urban areas. Furthermore, delivery of the NPS must be clearly set within the context of England's existing biodiversity commitments and aspirations as set out in Biodiversity 2020.

Importing bees for pollination: Link welcomes the actions on disease transmission, but feels there are wider issues to be considered including the potential for non-native species to escape and become invasive whether released deliberately or escaping from polytunnels. Invasive non-native species can have negative ecological and economic impacts including competition with native pollinators. Link recommends that the NPS promotes adherence to guidance from the GB Non-Native Species Strategy.

Can you provide any examples of good practices in these areas which are already helping pollinators?

Link members are already carrying out extensive work to benefit pollinators, and their staff are significant sources of expertise. A few examples of our work are given below; more detail is available on request:

- Link members are involved in various landscape-scale projects with significant benefits to pollinators. Buglife is promoting the development of a network of B-Lines throughout the UK to help support native insect pollinators and other wildlife in the wider countryside. The RSPB's Futurescapes programme includes projects aimed at helping pollinators, for example within the Dearne Valley Nature Improvement Area where RSPB staff are working alongside partner organisations to deliver improvements in urban greenspace such as more wildlife sensitive cutting regimes. The Wildlife Trusts have more than 100 Living Landscapes across the UK; working in partnership with others to restore, recreate and reconnect wildlife-rich spaces in rural and urban areas. Local Wildlife Trusts also offer identification training courses, resources providing advice for gardeners and curriculum resources for schools.
- Link members provide management advice and guidance for a variety of habitats and priority species. Many of our organisations work directly with farmers and other land managers to advise on wildlife-friendly land management.
- Buglife provides information on brownfield sites via their Brownfield Hub: <http://www.buglife.org.uk/brownfield-hub>. If properly managed, brownfield sites with high value for biodiversity can transform themselves into wild city spaces full of wildflowers that will attract pollinators and other animals.
- The Save our Magnificent Meadows project, led by Plantlife, is a £3 million HLF-funded project which will protect, conserve and restore wildflower meadows across the UK.

⁸ For further detail please see the Link position paper: http://www.wcl.org.uk/docs/Link_EIA_briefing_Mar13.pdf

- Butterfly Conservation's Farmland Butterfly Initiative, run with Natural England, is encouraging management aimed at their Big Three requirements in grassland habitats (all of which are relevant to pollinators): Well structured vegetation, spring and summer nectar, shelter and scrub.

5. Have we identified the right priority areas for further research and monitoring, or are there further issues you want to identify (in Chapter 3)?

The impacts of neonicotinoids are identified as a particular research need, which Link agrees with. However we are extremely concerned that the proposed 'lead' for this action is pesticide manufacturers. The story of the neonicotinoid debate so far illustrates the critical importance of independent, peer-reviewed and non-commercially driven research. We propose therefore that this action should be led by government and independent research bodies, and acknowledgement should be made of the large body of peer-reviewed evidence that already exists on this topic.

As mentioned above, Link believes that there are wider pesticide issues to be addressed as well as neonicotinoids. Link believes that more research effort should be focused on developing sustainable alternatives to pesticides, and on increasing the yields and sustainability of low-pesticide input farming systems that incorporate the principles of Integrated Pest Management. The current debate over neonicotinoids highlights the farming industry's untenable reliance on a small group of chemicals to maintain high yields within the current intensive farming approach.

Link has noted the increased profile recently given to Genetically Modified Crops both in the EU and the UK. Our members have serious concerns about the possible impacts on pollinators of the herbicide-tolerant and insect-resistant crops that are currently in the pipeline. We ask Defra to commit to rigorous field-scale trials and monitoring before granting approval for any GM crop.

Although the draft strategy has a welcome focus on research and monitoring, Link feels that more focus needs to be given to poorly-understood groups (much research effort to date has focused on bees), and on monitoring quantity and quality of pollinator habitat.

6. How could you contribute further to the priority actions?

As outlined in our answer to the second part of question 4, Link members are already contributing significantly to helping pollinators and will continue to do so through our ongoing work.



Wildlife and Countryside Link
89 Albert Embankment, London, SE1 7TP
W: www.wcl.org.uk

Wildlife and Countryside Link is a registered
charity (No. 1107460) and a company limited
by guarantee in England and Wales (No.3889519)