

Q4) Do you have any comments on the vision and aims for pollinators? Yes/No

Yes

If 'Yes', please comment in the box below.

The NFU recognizes the importance and value of insect pollinators, not only in terms of crop pollination but also pollination of wild plants and habitats within the wider countryside, many of which will fall under the management of farmers and growers. Accordingly we fully support the Government's vision 'to see pollinators thrive, providing essential pollination services and benefits for food production, the wider environment and everyone'.

The NFU supports the key aims as described in the consultation. We have been working closely with Government and others since the Strategy was announced to build partnerships and consensus, and our involvement is set to continue.

It is essential we improve our understanding around pollinators. Most critically this includes the development and implementation of a sustainable monitoring programme for pollinators. It also highlights the need to fund research to start filling the gaps in our knowledge.

The commitment to review and refresh the strategy's aims and actions as new evidence becomes available is also viewed by the NFU as one of the key proposals in the strategy. Considering how the strategy is built on an excellent understanding of the current evidence around pollinators and pollination services, and of the gaps in that understanding, it is essential that as new evidence becomes available to close those gaps, there is commitment and flexibility within the strategy to review and refresh actions accordingly.

Also essential to this process will be one of the proposed policy actions that focusses on improving knowledge exchange between scientists, NGOs and practitioners to ensure there is good movement of science into practice.

Considering the evidence we know and the many uncertainties involved in this issue, the NFU sees the proposed strategy as generally providing a balanced, pragmatic, evidence-based and still challenging approach to supporting pollinators. Importantly, it also provides a clear framework for doing more as we find out more.

As with all such strategies, it is important to review the aims. The NFU agrees with the timelines around measuring success. It is understandable that it will take 5 years to establish an effective monitoring system that will provide a common baseline to assess the status of pollinators.

Finally, under the vision and aims section of the consultation (point 22), there is a loose reference to developing the concept of payment for pollination services, as an ecosystem service (presumably as opposed to a paid-for pollination services provided by beekeepers). It is important that such work actually considers whether or not the entire supply chain for a product is prepared to support the cost of any such payment. Farming and growing businesses have limited ability to absorb such additional costs, as they have limited or no ability to push additional costs further down the supply chain.

Q5) Have we given a fair summary of main areas of concern for pollinators and the available evidence (in Annex 1)? - Yes/No

Yes

Q6) If you answered 'No' to question 5, please use the box below if you wish to identify any further issues about the areas of concern and the available evidence.

The issue of pollinators is very high profile and the media coverage about changes in pollinator populations and what might be causing any changes is more often driven by emotion and opinion rather than evidence. At best, media coverage highlights selected single pieces of evidence. While, this piecemeal approach builds a public view of an issue, it often does so in a very polarized way that is far from reflecting a balanced spread of the available evidence or where the weight of evidence lies.

The NFU sees that the real strength of the draft National Pollinator Strategy is that it is strongly evidence-based, drawing heavily on the detailed independent report on the 'Status and value of pollinators and pollination services', which accompanies the consultation. It is important that this position continues and that going forward the National Pollinator Strategy becomes more widely recognised and accepted the evidence-based go-to response to all things 'pollinator'.

While we consider Annex 1 does provide a fair summary of the areas of concern for pollinators and the available evidence, the NFU believes there are four clear areas where the National Pollinator Strategy should be improved further.

1. Acknowledging the challenges around pollinator-friendly management on farmland

Extending flower-rich habitats for pollinators' on farmland will require effective promotion, demonstration, knowledge transfer and communication of best practice. The consultation is correct when it states that 'the promotion of pollinator-friendly management of farmland is key to extending flower-rich habitats for pollinators'. But the reality is also that the main factor determining whether or not action to provide flower-rich habitats on farmland is taken, is whether or not it is economically sustainable for a business to take such action.

The consultation states that we will only be in a position to finalise plans for promoting the pollinator-friendly management of farmland once decisions have been taken about how a reformed Common Agricultural Policy (CAP) will be implemented in England. It also states that this action will be a balance of incentivized, voluntary and regulatory activity (i.e. mandatory greening measures).

However, during the course of the consultation period it has become increasingly clear to the NFU that Ministers are unlikely to agree to pollinator-specific Ecological Focus Areas (EFAs) under greening that are weighted in a way to incentivize uptake. This is disappointing and a missed opportunity to encourage the uptake of land-management measures to benefit pollinators. The NFU would like to see the widest possible range of EFA measures being available, so the UK is on a level playing field with other member states and farmers have choice. This would mean having pollinator-focussed EFA's that are in addition to and not instead of other EFA's.

We also know that under the New Environmental Land Management Schemes (NELMS) from 2016, the area of Pillar II funded agri-environment schemes is due to fall from 70% of farmland to 35-40% by 2020. So it seems clear that there is going to be less funding available and that fewer farmers and growers are going to have access to incentivised measures to benefit pollinators.

So, while the consultation states that there are three mechanisms by which measures for pollinators on farmland can be delivered – incentivised, voluntary and regulatory – Government appears to be significantly reducing the access and rewards for farmers under two of the three mechanisms (incentivised and regulatory). This then puts significant pressure on delivery through voluntary action.

Increasing the uptake of measures for pollinators on farmland through voluntary measures alone is going to be extremely challenging for the industry. Maintaining existing measures and creating new measures has a cost. Farming and growing businesses have limited ability to absorb such additional costs, as they have

limited or no ability to push additional costs further down the supply chain.

This situation is further complicated by the fact that many farmers and growers rent-in significant proportions of land on an annual or short-term basis (5 years or less). In the potato sector around 70% of land is rented-in in this way, in the brassica sector the figure is around 60%, and in the arable sector the figure is commonly around 50%. In such cases, the ability to deliver measures for pollinators rests with the landowner rather than with the farmer or grower.

The NFU has already committed to promoting the uptake of management measures on farmland to benefit pollinators, both under the Campaign for the Farmed Environment (CFE) and more widely, and work is underway to achieve this. Considering how Government appears to be reducing the ability for farmers and growers to put-in measures to benefit pollinators (by reducing access to incentivised agri-environment schemes, and not having weighted pollinator-focussed EFAs), the NFU considers that it is unreasonable for the consultation to state that 'if the voluntary measures fall beneath expectations then an option remains to tighten-up the minimum greening requirements'.

The NFU is concerned that going forward, there is a significant risk that farmers and growers are likely to be called upon to deliver more for less on the issue of pollinators, and we do not feel that this challenging situation facing farming is clearly enough stated in the National Pollinator Strategy.

2. Acknowledging the benefits associated with land-use intensification

During the National Pollinator Strategy workshop in October, the Minister Lord de Mauley commented on the vital role of pollinators in the security of food supply, but also made the clear statement that policies must protect the environment while also ensuring food security. Lord de Mauley also made it clear that the National Pollinator Strategy must be evidence-based. At the same meeting Alick Simmons, Deputy Chief Veterinary Officer at Defra, stated clearly that any interventions under a National Pollinator Strategy must have strong economic and cost-effective support.

These statements are similar to those made at a European level. The European Food Safety Authority's 2012 Scientific Opinion on the science behind the development of a risk assessment of plant protection products on bees states clearly that there is a trade-off between plant protection and the protection of bees – a balance between production and environmental protection that must be considered. This position was reinforced last year by the EFSA scientific colloquium report 'Towards holistic approaches to the risk assessment of multiple stressors in bees', which recognised that in agricultural contexts there are 4 factors that need protection ('protection goals') – biodiversity, crop pollination/pollination services, honey production, and crop production.

The consultation details a range of factors that are placing environmental pressures on pollinators, including clearly negative factors that are undesirable in all circumstances, such as pests and pathogens, invasive species and climate change. It also includes factors such as the intensification of land-use, but it fails to make it clear that examples of this intensification, such as the alteration of landscapes, the use of monocultures, pesticide use and urbanization, are also all factors that deliver significant benefits to society. There are many positive aspects of these factors that society has a clear and strong interest in protecting, whether it be reliable and affordable food production or providing much needed new housing.

Actions to improve the status of pollinators are going to be most contentious and challenging in areas where there are these seemingly 'opposing benefits' to be considered. But overcoming that challenge, to deliver actions that provide new 'win-win' benefits is only going to be possible if all the existing benefits of all parts of the issue are acknowledged and understood to begin with.

As it stands, the National Pollinator Strategy fails to do this – it fails to acknowledge the benefits to society of the alteration of landscapes, the use of monocultures, pesticide use and urbanization. As such, the draft strategy fails to give the whole picture to the reader, it risks building expectations that might not be

achievable, and risks later failure and disenfranchisement with aspects of the strategy, because they were not built on a full and balanced understanding of the issues.

The NFU believes that the final National Pollinator Strategy needs to recognize much more clearly that there are benefits to the various strands of land-use intensification, including pesticide use, and that these benefits have to be taken into account when considering what measures can be taken to ease environmental pressures on pollinators.

3. Being clear about when land-use intensification happened

Land-use intensification, including landscape alteration, cultivation of monocultures and agrochemical use, is discussed in the status report and consultation as a factor impacting on pollinator populations. This 'intensification' is often portrayed as a constant upward trend in UK farming systems over the last half century, when in actual fact there have been significant changes in policy direction and farming practice over the last 20 years.

A clear example of this is the trends in pesticide use. While the area of all crops treated with pesticides has increased by 43% between 1990 and 2012, the total weight of pesticides applied had decreased steadily since 1990 and fallen by 50% over the same time period. The weight of active applied has fallen steadily from 0.774kg/ha in 1991 to its lowest level of 0.22kg/ha in 2012, a decrease on average of over 71%. Similar trends are observed across all the major groups of crop protection products - insecticides, herbicides and fungicides.

While the decrease is less in some crops (the weight of pesticides applied in cereals has fallen by around 33% between 1990 and 2012), the general trend is that while there are more applications, these applications are more targeted and overall much less active ingredient is being used.

It is our belief that this trend - for the 'intensification' being historic rather than current - is likely to also be true for the other factors discussed – landscape alteration (the degradation, destruction and fragmentation of semi-natural habitats) and the shift to simplified crop rotations that can result in areas of monoculture.

Significantly, there is also some evidence that declines in the biodiversity of pollinator populations in the UK have slowed or started to reverse in the last 20 years. The suggestion is that this change reflects the changes in policy direction and farming practice during recent decades – the switch from maximising output to optimizing output, a focus on the sustainability of production, and the introduction and development of agri-environment' schemes.

The NFU believes it important for the final National Pollinator Strategy to accurately and effectively communicate whether drivers of change in pollinator status are historic or current. Otherwise the risk is that a current group of stakeholders get held accountable for historic issues over which they had no control or influence – this would easily and quickly lead to the disenfranchisement of these stakeholders.

4. The National Pollinator Strategy needs to collate and promote on-going and new activity to benefit pollinators

The NFU believes that the National Pollinator Strategy should act as a repository, collating and promoting all on-going and new activity to benefit pollinators.

We noted that Annex 1 of the consultation mentions that agri-environment schemes benefit pollinators but does not include any measure of the area currently under these schemes. These areas should be included within the final National Pollinator Strategy, particularly as from 2016 the measures benefitting pollinators under the current schemes will start to be replaced with measures under NELMS.

Highlighting these areas would help keep track on how the provision for pollinators via incentivised

measures changes under NELMS.

In the past the NFU has used the figure of over 150,000 hectares of buffer strips, pollen and nectar mixtures, wild bird seed mixtures, hay meadows and wildflowers areas under agri-environment schemes – all providing food and habitat for bees.

The National Pollinator Strategy should also acknowledge and promote the amount of IPM undertaken by farmers and growers, as soon as this information becomes available from the new IPM Plans currently being rolled out through the Voluntary Initiative (VI).

Q7) Do you have any suggestions on the best way to communicate the 'Call to Action' (once agreed) to many different audiences? - Yes/No

Yes

Q8) If you answered 'Yes' to question 7, please use the box below to offer your suggestions.

We believe that the call to action rightly focuses on simple actions that we are confident will provide the essential needs for pollinators – providing food (pollen and nectar), and places to shelter, nest and overwinter. It will be important to provide well-targeted guidance for a range of different communities on how to help pollinators.

The NFU has a clear role to play in communicating the 'Call to Action' message to its farming and growing members, and over the last year it has been already keeping them up to date on the development and progress of the National Pollinator Strategy.

In addition to our 55,000 plus farming and growing members, we would also be able to communicate the 'Call to Action' to our 40,000 countryside members, who have an interest in the countryside and rural affairs. And we would be able to do this via email newsletters and updates, magazine and online articles.

Q9) Do you agree with the priority actions summarised in Chapter 3? - Yes/No

Yes

Q10) We would welcome any examples of good practices

The main initiatives involving farmland are mentioned, such as the CFE, Operation Pollinator the VI Integrated Pest Management Plans.

One initiative not mentioned is the BBKA's pollination dating service that aims to connect landowners with potential apiary sites with beekeepers (www.pollinationdating.com). The NFU has also done some work in this area with its 'Farming for bees' leaflet – calling on farmers and growers to offer sites for honeybees, and then putting those farmers in touch with bee farmers in their area.

Another on-farm measure we are becoming increasingly aware of is where solar farm developments are being undersown with wildflower mixes to benefit pollinators. BRE has recently launched Biodiversity Guidance for Solar Development to help planners and the solar industry support biodiversity on solar farms (<http://www.bre.co.uk/filelibrary/pdf/Brochures/NSC-Biodiversity-Guidance.pdf>).

We have also heard of a case where farmers' expertise and equipment is being used to help to establish temporary wildflower mixes on a brownfield site earmarked for future development.

Q11) Have we identified the right priority areas for further research and monitoring (in Chapter 3)?

Yes/No

No

Q12) If you answered 'No' to question 11, please use the box below to identify any further issues about priority areas for research and monitoring.

Generally speaking our answer to Q11 would be 'Yes', but there are some additional areas we would like to comment on and place additional emphasis on as follows.

Evidence actions 1-6

Most critically, several of these proposals focus on the development and implementation of a sustainable monitoring programme for pollinators. The NFU believes that the delivery of such a monitoring scheme is a key priority of the Strategy, and it must be adequately resourced and funded to ensure it is successful.

The NFU agrees with the timelines around measuring success. It is understandable that it will take 5 years to establish an effective monitoring system that will provide a common baseline to assess the status of pollinators.

Evidence action 7: Feasibility study on conducting primary research on relationship between pollinators and pollination services in crop production

Farmers and growers are more likely to invest in protecting pollinators and pollination services if they understood clearly the added value of doing so. Some recently published work in the UK has shown potential pollination deficits in orchards and the potential to increase yield (Garratt et al, 2014 Pollination deficits in UK apple orchards. *Journal of Pollination Ecology*, 12(2), 2014, pp 9-14), yet our understanding is that there is still no evidence to show that enhancing pollination actually makes a difference to the bottom line of UK farming businesses. However, recently published work on US blueberry crops (Blaauw & Isaacs 2014 Flower plantings increase wild bee abundance and the pollination services provided to a pollination-dependent crop. *Journal of Applied Ecology* 2014 doi: 10.1111/1365-2664.12257) has shown that providing habitat with season-long floral resources optimized for wild bees can provide yield benefits, with values exceeding the cost of habitat establishment and maintenance .

The NFU sees that it is important that work is done to better establish the value of pollination services to different UK crops and so supports this evidence action being undertaken.

In relation to Evidence actions 1-6 & 7, the NFU would want to see the relationship between weather patterns and pollinator activity to also be measured. The status report refers to climate change as a possible driver and pressure on pollinators, and yet the impacts of climate and weather do not appear to be considered among the evidence actions.

From an agricultural pollination point of view, the weather during the pollination window (that can be as short as two weeks in some outdoor crops) is arguably the most critical factor in determining the effectiveness of pollination and resulting yields in crops heavily dependent on insect pollination.

Evidence actions 10 & 11

Two of the proposals look at neonicotinoids - the first calls upon pesticide manufacturers and possibly

others to determine the effects of neonicotinoids on wild and managed pollinators under field conditions. The second proposal is for Defra to lead on an (on-going) assessment of how the neonicotinoid restrictions are changing farmers' decisions on cropping and pesticide use. This looks like it would be delivered simply through existing monitoring schemes of cropping and pesticide use.

The NFU supports work to better understand the impacts of neonicotinoids on bees under field conditions and to determine how the restrictions are impacting cropping and pesticide use.

Evidence action 12: reviewing evidence on risks posed by commercially-produced bumblebees and other pollinators

The NFU supports the review of the evidence in this area as it is unclear at present. Our understanding is that currently there is no clear evidence that transfer of pests or diseases from commercially-reared bumblebees to wild bees is occurring, or that genetic issues arising from the interbreeding of commercially-reared bees and wild bees is occurring.

Finally, despite of the publication of Defra's honey bee health programme in 2009, it is still the case that there is the need for significant funding for research and development on pests and diseases such as Varroa, Nosema, foul-brood and viruses, and to improve honeybee genetics and to improve understanding of honeybee nutrition. Beekeepers number one priority to help improve the health of their honeybee colonies would be to develop an effective control agent for Varroa.

Q13) How could you contribute further to priority actions?

The NFU is already involved in helping develop or deliver some of the priority actions, either directly or through our involvement with the CFE. We have already been involved along with others in the development of the 'Call to Action' (although this is not identified in the consultation, unless NFU is listed under the 'NGO' banner) and we would like to continue with this.

Q14) We have asked a number of specific questions. If you would like to provide any comments on related issues which we have not specifically addressed, please use the space below to report them.

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The National Pollinator Strategy should also acknowledge and promote the amount of IPM undertaken by farmers and growers, as soon as this information becomes available from the new IPM Plans currently being rolled out through the Voluntary Initiative (VI).

The NFU also has some specific comments on some of the priority actions.

Policy priority action 2: Ensuring pollinators are a key focus of CAP reform under Pillars I and II and in the development of targeted voluntary actions

As discussed above, while the NFU supports the idea of pollinators being a key focus of Pillar I measures (greening) and Pillar II measures (agri-environment schemes), we are concerned that the final outcome of the reform will not increase the rewards and incentives for farmers to implement land management measures to benefit pollinators. As a result, we could see a significant shift away from actions supported under CAP, to voluntary measures. We would remind Defra that the consultation itself states that a balance of incentivised, voluntary and regulatory activity must be maintained to benefit pollinators while also promoting competition and safeguarding food security.

Policy priority actions 5-7

The NFU supports the three proposals focussing on issues around IPM. We welcome that Defra have referred clearly to the Directive 2009/128/EC on the sustainable use of pesticides, which makes it clear that IPM is about minimizing risks associated with pesticides and encouraging the use of alternatives and natural control mechanisms.

The NFU believes the proposed actions regarding pesticides and IPM in the draft strategy are proportionate and evidence-based, and appropriately reflect the EU and UK regulatory regimes, the code of practice for using plant protection products, the EU directive on the sustainable use of pesticides, and the UK national action plan for the sustainable use of pesticides.

Policy priority actions 15 & 16

The NFU supports the work being done under the Healthy Bees Plan and sits on the Bee Health Advisory Forum that oversees its implementation.

Despite of the publication of Defra's honey bee health programme in 2009, it is still the case that there is the need for significant funding for research and development on pests and diseases such as Varroa, Nosema, foul-brood and viruses, and to improve honeybee genetics and to improve understanding of honeybee nutrition. Beekeepers number one priority to help improve the health of their honeybee colonies would be to develop an effective control agent for Varroa.

Policy priority actions 17 & 18 relate to engaging the public and improving the sharing of knowledge

In the 'Call to Action' members of the public are asked to consider growing more flowers to provide food for pollinators. They are also reminded to follow good practice and instructions when using pesticides.

The NFU is aware that some organisations are calling for the National Pollinator Strategy to recommend that members of the public do not use pesticides in their gardens. As per the principles of IPM, it is appropriate that users of amateur pesticide products should consider whether use is necessary, whether alternative control methods could be used, and if pesticides are used they should ensure they follow all the on-label instructions. However, the NFU believes it would be wholly inappropriate for the strategy to gold-plate and go beyond these regulatory and best practice positions on pesticide use, and recommend not using pesticides.

The pollinators issue is frequently hijacked by organisations with anti-pesticide agendas, which see pollinators – a high profile issue with significant public interest and empathy – as a way to forward agendas to reduce and prevent pesticide use. Such approaches are driven by a highly precautionary hazard-based approach to pesticides use and not by an evidence-based appraisal of what would actually benefit pollinators.