

To Defra's National Pollinator Strategy mailbox from NFU representative  
01/05/14 18:16

#### Consultation on the National Pollinator Strategy

The NFU has responded to the consultation on the National Pollinator Strategy using the online form. As with all such forms, they do not necessarily fit with or clearly accommodate the issues you would like to raise. So while we have used the form, we would also like to submit our full response to the consultation (see attached), which lays out the issues we would like to raise in a more structured way.

As with many such consultations we would also like to raise the concern that when you complete an online form, or when your consultation response is analysed, it can be counted as a single response. We have consulted widely with farmers and growers in developing our response to the consultation and would like it noted that we are representing the interests of more than 55,000 farming and growing members.

Kind regards

[REDACTED] (NFU representative)

Attachment 010514

#### Document 010514

To:

Date: April 2014

Ref:

Circulation:

Contact: [REDACTED]

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The NFU represents more than 55,000 farming and growing members and in addition some 40,000 countryside members with an interest in the countryside and rural affairs.

### National Pollinator Strategy consultation

Defra has published a draft National Pollinator Strategy for bees and other pollinators in England, which sets out proposals to safeguard pollinating insects, given their important role in contributing to food production and the diversity of our environment through the pollination of many crop and wild plants.

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 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'.

The Status report makes clear the considerable uncertainties around pollinators and pollination services. From looking at the available evidence it is clear that there is uncertainty over the status of pollinators (whether species are in decline or not), uncertainty over the possible causes of any changes in this status, and uncertainty over the implications of any changes in this status (e.g. whether the declines are actually causing problems with lack of pollination). One of the most significant statements in the whole consultation and supporting documents is found in the conclusion of the status report, and it says 'Without systematic and standardised monitoring of pollinator populations it is impossible to state unequivocally whether wild insect pollinators are in decline or not.' This statement provides a clear baseline regarding our current state of knowledge, and more importantly emphasizes the critical need to adequately fund and develop such a monitoring programme.

We recognize the uncertainty around the evidence makes developing policy proposals for action very challenging. It is important for actions under the strategy to be cost-effective, and this is going to be dependent on the available evidence to demonstrate that the action is going to achieve significant net benefit. We also agree that the uncertainty over some aspects must not be used as an excuse for general inaction. Considering this challenge, the NFU believes the strategy proposes a well-balanced and reasoned response by focussing on three main elements:

**1. Evidence-gathering on pollinator status and impacts of pressures to provide a sound base for future policies to support 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.

**2. Priority policy actions in areas where we do have good existing evidence, and also to build on current initiatives (e.g. Campaign for the Farmed Environment (CFE), Integrated Pest Management (IPM)) and to refocus them on the essential needs of pollinators.**

These policy actions include a 'Call to Action' to provide the right information to businesses, other organisations and the public to support pollinators. 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.

### **3. A commitment to review and refresh the strategy's aims and actions as new evidence becomes available.**

The NFU sees this 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.

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.

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<sup>1</sup> 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'<sup>2</sup>, which recognised that in agricultural contexts there are 4 factors that need protection

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<sup>1</sup> <http://www.efsa.europa.eu/en/efsajournal/pub/2668.htm>

<sup>2</sup> <http://www.efsa.europa.eu/en/supporting/doc/509e.pdf>

('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<sup>3</sup>. 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).

#### **Proposed actions under the strategy**

The strategy has 30 proposed actions. Considering the uncertainties in the evidence, the NFU supports the proposal for 12 of these actions to focus on evidence gathering between 2014 and 2017, to better understand the status of pollinators and the pressures they face.

#### **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.

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<sup>3</sup> Carvalho et al. 2013 Species richness declines and biotic homogenisation have slowed down for NW-European pollinators and plants. Ecology Letters, 16(7):870-8

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<sup>4</sup>, 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 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<sup>5</sup>.

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

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<sup>4</sup> Garratt et al, 2014 Pollination deficits in UK apple orchards. *Journal of Pollination Ecology*, 12(2), 2014, pp 9-14

<sup>5</sup> 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

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.

There are 18 proposed policy actions for Government and others to take forward from 2014. The aims of these actions are to for there to be

- 1) diverse and flower-rich habitats to support pollinators across all landscapes (farmland, public land, in cities, gardens, alongside transport networks and other infrastructure)
- 2) healthy pollinators to support pollination services
- 3) enhanced awareness of everyone of the needs of pollinators and the actions that can be taken to support them.

**Policy priority action 1: Create ‘Call to Action’ package of advice for bees and other pollinators**

**Policy priority action 3: Secure commitment of farm advice providers to draw on the ‘Call to Action’ package**

The first proposed policy action focusses on developing and delivering the call to action message. The NFU supports the ‘Call to Action’ that rightly focuses on simple actions around providing food and shelter for pollinators. We will continue to work with Defra and other stakeholders to further refine, develop and promote the ‘Call to Action’ package.

**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 action 4: CFE developing and implementing on-farm pollinator events, supported by the new CFE leaflet ‘Pollinator management for your farm business’**

The NFU fully supports this proposal.

**Policy priority action 5: Review and update current IPM guidance and information, and distributing it to farmers (led by HSE working with others)**

**Policy priority action 6: VI to revise and re-publish guidance on insecticide best practice, and make sure annual spray operators training includes ‘more detailed coverage on the responsible use of insecticides’**

**Policy priority action 7: Facilitate increased sharing of IPM practices between farmers and growers, including on-farm demonstrations, walks and workshops (led by Defra working with CFE and others)**



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 8–14 concern actions to deliver diverse and flower-rich habitats on urban and public land, so the NFU does not feel it is best placed to comment on these proposals.

**Policy priority action 15: Improve beekeepers management of pest and disease risks of honeybees through the Healthy Bees Plan**

**Policy priority action 16: Implement revised policies to control pest and disease risks of honeybees**

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.

Lastly, the consultation asks about examples of good practices which are already helping pollinators that have not been mentioned in the consultation or supporting

document. 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](http://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.

To Defra officials from NFU representative

02/05/14 15:03

### Garden pesticides

Hi

In the NFU response to the National Pollinator Strategy we mention that we are aware some organisations are calling for the strategy to recommend that members of the public do not use pesticides in their gardens, and we make it clear that we believe it would be wholly inappropriate for the strategy to do this and gold-plate and go beyond the on-label, regulatory and best practice positions on pesticide use. This would contradict and undermine Government's position as the regulator. By all means we can encourage gardeners to consider whether use is necessary, whether alternative control methods could be used, and that if pesticides are used they should ensure they follow all the on-label instructions. However it would be a mistake for the strategy to recommend not using garden pesticides.

In response to another question, I happen to have looked at all the registered Garden Pesticides on the HSE site today. What jumped out at me was that there are 160 registered products – 75% of these are based on fatty acids, pyrethrins, sulphur and ferric phosphate (mainly the first two actives) – which as I understand it are all actives allowed to be used in organic production. The other 25% of the registered garden pesticides are based on what you might call synthetic chemical pesticides.

So, considering that many of those organisations that are calling for the strategy to recommend that gardeners do not use pesticides, are organisations that strongly support or promote organic production, I have to wonder if they know what they are actually asking for. Because in effect they are calling on the strategy to recommend not using a set of pesticides, the majority of which are used and relied upon in organic production.

Thought you might find this of interest.

Cheers

■■■■ (NFU representative)

To Agriculture and Horticulture Development Board representative, National Farmers Union representative, Linking Environment and Farming representative, and Defra and Health & Safety Executive officials, from Defra Official  
13/05/14 09:35

**National Pollinator Strategy - revisions on IPM following public consultation**

Dear [REDACTED] representatives and officials as above)

We're working on the responses to the public consultation which closed on 2 May and are considering reviewing one of the proposed actions on IPM – action 7:

<u>Consultation draft of NPS</u> 7. Facilitate increased sharing of IPM practices between farmers and growers particularly on the management of crops which are attractive to pollinators, including on-farm demonstrations, farm walks and on-farm workshops.	<b>Defra</b> working with CFE, LEAF, AHDB and VI.	From 2014
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Comments received on the Strategy's IPM proposals included that the proposals were too vague and weren't offering anything new on IPM – the actions needed to be additional to existing requirements. Many respondents wanted to see a step change in the use of IPM by farmers. Other comments suggested that government and industry should develop a clear definition of IPM; develop crop and sector-specific protocols; provide extension services to assist farmers implement IPM; and incorporate mandatory training in IPM for all sectors into existing assurance schemes.

In the light of these comments, we would like to amend action 7 above to make a more specific offer on how best to share IPM practices with farmers and would welcome your views and agreement to work with us on this. Our aim would be to include this new action in the finalised Strategy (aiming to publish this summer) and then to work out the exact details with you in the early stages of implementation.

At this stage, I'd welcome your in-principle agreement to the proposed **new action** to replace action 7:

Defra will work with HSE/CRD, CFE, LEAF, AHDB, VI and others to set up a (series of?) workshop(s) on IPM [to share case studies, crop protocols and other methods of production] aimed at farmers, growers, advisers, agronomists, colleges and trainers. We could also invite Red Tractor reps on food assurance possibilities (encourage them to strengthen their environmental offer to include pollinators?).

Based on this outline, I'd particularly welcome your views on:

1. Rather than inviting farmers and growers (who would still have access to on-farm demos, farm walks and on-farm workshops – we could retain this aspect of action 7

in the strategy) should this new action be targeted at advisers, agronomists, colleges and trainers (plus food assurance schemes)?

2. Should we have a series of workshops – across 3 or 4 regions – to reflect different types of agriculture (crop protocols and case studies)?
3. Could we hold the first of these workshops in 2014/15? Defra could provide funding for a venue. We might be able to secure some sponsorship (would NFU help to co-fund?)?
4. Could we identify a widely-read farmers' journal/magazine to capture the crop protocols and case studies from these workshops and cascade to a wide readership?
5. Any other ideas?

In relation to 'other methods of production', we would also invite the Soil Association to be part of these workshops, as they have been critical that the Strategy does not mention organic production or the evidence of how this supports pollinators. Hence the workshops would be on IPM and other methods of production to support pollinators. I will contact the Soil Association to see if they agree to be part of this new action.

With apologies for the short notice, I'd welcome any views on this new action and your in-principle agreement to include it in the final version of the Strategy by 16 May if possible.

Many thanks

██████████ (Defra official)

To National Farmers Union representatives, Natural England officials, Horticultural Trade Association representatives, and Country Land and Business Association Limited, from Defra Official  
13/05/14 12:55

**National Pollinator Strategy - proposed new action directed at farmers and growers**

Dear [REDACTED] (representatives and officials as above)

We're working on the responses to the public consultation on the draft strategy which closed on 2 May and are considering adding a new action directed at farmers and growers. This would address the consultation responses which press for actions to engage farmers, growers and their advisers/ colleges/trainers more actively on the call to action advice on managing land to support pollinators.

The proposed new action would be along the lines:

Defra, Natural England, CFE, NFU, CLA, HTA (and academia) will work together to set up workshop(s) for farmers, growers, advisers, colleges and trainers (and possibly assurance schemes like Red Tractor) on best practice to support pollinators, based on the call to action advice and case studies. Aiming to hold in 2015 when the call to action advice will be more fully developed.

It is possible that the workshops could be badged as part of a Special Issue of the Conservation Evidence journal which is freely available; this is under discussion with the editor [REDACTED] and would require peer-reviewed papers – hence academia is mentioned. We'd need to think about peer-reviewed evidence as it might be in short supply and would constrain us in sharing best practice and case studies on practical steps to help pollinators?

I'd be grateful for your views on this proposed new action and for your in-principle agreement CFE, NFU, CLA, HTA working with Defra and Natural England to implement this action. If we can agree in principle, then we'd work up the details during the early stages of implementing the strategy.

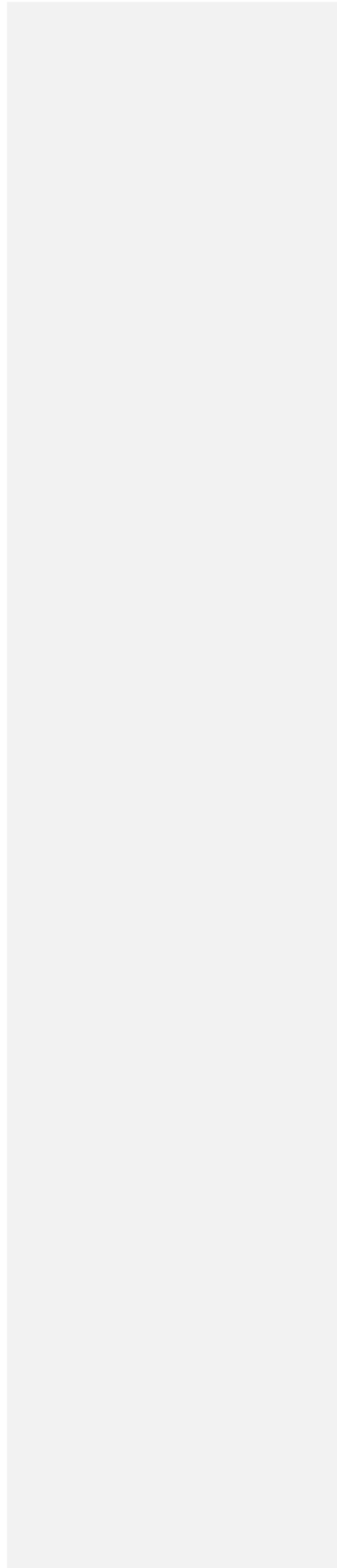
I'd particularly welcome your views on:

6. Rather than inviting farmers and growers should this new action be targeted at advisers, agronomists, colleges and trainers (plus food assurance schemes and maybe LANTRA)?
7. Should we have a series of workshops – across 3 or 4 regions in England?
8. Could we hold the first of these workshops in 2015 – we'd need to wait until the call to action advice is more fully developed and also when the new CAP is pinned down? Defra could provide funding for a venue. We might be able to secure some sponsorship (would NFU help to co-fund?)?
9. Could we identify a widely-read farmers' journal/magazine to capture the case studies from these workshops and cascade to a wide readership?
10. Any other ideas?

With apologies for the short notice, I'd welcome your views on this new action and your in-principle agreement to include it in the final version of the Strategy by 16 May if possible.

Many thanks

 Defra Official)



To Defra official from NFU representative  
14/05/14 16:50

Reference

Hi [REDACTED] (Defra official)

This is the 2013 research I mentioned  
<http://onlinelibrary.wiley.com/doi/10.1111/ele.12082/abstract>. Interestingly it says

- higher vegetation diversity in conventional crop fields may increase pollinator abundance to the same extent as organically managed fields with low vegetation diversity
- it raises the concern that fields under organic management are increasingly becoming large monocultures, and this would be detrimental for bees
- enhancing field diversity can lead to an average 76% increase in bee abundance

Cheers

[REDACTED] (NFU representative)



To Defra Official and Agricultural Development Board representative from NFU representative  
16/05/14 16:57

**National Pollinator Strategy - revisions on IPM following public consultation**

Hi [REDACTED] (Defra official)

Regarding your proposal to amend the current action 7. 'Facilitate increased sharing of IPM practices between farmers' to say 'Facilitate increased sharing of IPM practices between farmers and growers particularly on the management of crops which are attractive to pollinators, including on-farm demonstrations, farm walks and on-farm workshops. Defra working with CFE, LEAF, AHDB and VI (From 2014)'.

The NFU supported the original version of the action, and we support the amended version in principle. **HOWEVER, there are some provisos, and we have some significant concerns about what is driving this need to do more and more under the banner of IPM.** Concern because it seems clear the underlying assumption driving this push is that pesticides are the problem with pollinators (and the view IPM is about reducing pesticide use), and the NFU does not agree with this position – and this is simply because the evidence (as given in the consultation status report) does not support this position.

There is also a risk that this distorts the focus of IPM. Under IPM, farmers and growers should be sharing best practice irrespective of the crop being grown. IPM is not about just managing the risks of pesticides to pollinators on pollinator-attractive crops, indeed there may be greater advantages to other approaches on other crops both in terms of practicality, economic and environmental benefits.

One of the challenges being made is that the National Pollinator Strategy actions need to be additional to existing requirements. The problem with this is that on IPM

- 1) we do not currently have a good understanding of how much is done or how much could be done. And because we are talking about crop/site/business specific actions, if we lost this tailoring – this specificity – by imposing some blanket general measures, we would actually lose much of the value of IPM. This lack of information will hopefully be tackled by the Integrated Pest Management Plans under the VI.

But if we do not have a good understanding of what we are doing currently, how can we judge the appropriateness of or commit to delivering more and more?

- 2) Despite the poor quantification of what IPM is already being done, we know many farmers and growers are actively and regularly employing IPM techniques. The problem is that the NGOs do not give the industry any credit for this, and paint the picture that the industry is doing nothing. If people are not given any credit for what they have done – what kind of a platform is that for asking them to do more?

The other 'challenge' you mention is for there to be a step-change in use of IPM by farmers – this already has to happen as a result of the National Action Plan (NAP) on the Sustainable Use of Pesticides needing to ensure the general principles of IPM are implemented by all professional pesticide users by 1 January 2014. It does not seem at all realistic to overlay this step-change with another.

If NGOs have an issue with the NAP, then that is where they need to direct their concerns. **We must not allow the National Pollinator Strategy to be hijacked and used as a mechanism to gold-plate the NAP or other policy or regulatory areas around pesticides.** Particularly because the status report with the consultation clearly states we do not even know whether or not pollinator species are currently in decline – if we do not even know this with certainty, we have even less certainty about what might be causing declines – and so we cannot provide any evidence-based justification for heavy-handed actions around pesticide use in a National Pollinator Strategy.

We understand that the NGOs find themselves in a challenging position. They campaigned for a National Pollinator Strategy on the basis that pesticides are the main cause of pollinator decline. And now they see the strategy as not being strong enough on pesticide use. But this is because they campaigned on the basis of popular opinion and not fact, and the strategy is based on fact.

**With respect to the CFE, we have concerns about further event/workshop overload and overburdening a limited CFE resource on top of what has already been agreed with Defra.** We only have a finite amount of days for the Regional CFE Coordinators in each county and are already being asked to deliver an awful lot for that. If we can double up with other messages and partners (and their budgets and time in kind) then ok, but there is only so much we can do. There are lots of environmental challenges the CFE is being seen as a solution to – pollinators is just one of them. **The CFE can deliver on the amended action 7, but only within the bounds of existing CFE resource and budget.** If we have to reopen the CFE Delivery Plan then we'll need to ask for additional budget.

With respect to NFU sponsorship, I am not sure we'll be able to do this. The NFU's support of the CFE over the last 5 years and going forward has been significant, and the CFE is our flagship contribution to addressing these sorts of challenges. If perhaps some of the other NGO's spent more money on positive constructive working than negative campaigning that would free up some funds.

Regarding assurance schemes you mentioned there has been a call to incorporate mandatory training in IPM for all sectors into existing assurance schemes, and ask about the involvement of assurance schemes such as Red Tractor. Red Tractor is first and foremost about food safety. It includes protection of the environment, but it purposefully does not cover additional measures that are specifically standalone environmental measures or enhancements. And Red Tractor assurance already covers things like the code of practice on pesticide use (which covers things like the requirement for continuing professional development and training), and it will doubtless take account of the NAP. So, much of what we are talking about is already embedded in Red Tractor assurance (though it is probably not widely understood that Red Tractor covers this) . So we do not think it appropriate to further gold plate this existing good practice, stewardship and auditing of regulatory requirements with unclear aims around IPM or pollinators. What exactly would you audit? **We do not think it appropriate to use assurance schemes as a mechanism to push additional measures for pollinators.** The audit burden is already significant enough as it is.

To avoid the potential of workshop overload for farmers and growers, it may be more appropriate to target advisers and agronomists.

With respect to disseminating case studies and best practice – we already do that via CFE and NFU publications and I'd imagine we would be happy to continue to give that support (our monthly magazine goes to all 55,000 farmer and grower members).

Finally, you mentioned that in relation to 'other methods of production', you would also invite the Soil Association to be part of the workshops, as they have been critical that the strategy does not mention organic production or the evidence of how this supports pollinators.

Firstly, we must be clear about what the evidence does and doesn't show us. Our understanding is that there is some emerging evidence that pollinator diversity and abundance is greater on organic than on conventional farms, but it seems quite clear that the reason for this is because of the greater diversity of plants on organic farms. This does not mean that to help pollinators, all we need to do is encourage more organic production (which is the line the Soil Association push). What it means is that we could help pollinators by increasing the plant diversity on conventional farms, and indeed the evidence shows that higher vegetation diversity in conventional crop fields may increase pollinator abundance to the same extent as organically managed fields with low vegetation diversity (which there are plenty of).

Secondly, in respect of organics the Soils Association are not the only stakeholders. If you invite them then you should also invite others representing the interests of organic producers, such as Organic Farmers & Growers (OF&G) <http://www.organicfarmers.org.uk/> (and not just because they have the NFU logo on the front page of their website).

Kind regards

■■■■ (NFU representative)

To Agricultural and Horticultural Development Board representative CC NFU representative, from Defra official  
13/05/14 09:35

Dear ■■■■■ (recipients as above)

We're working on the responses to the public consultation which closed on 2 May and are considering reviewing one of the proposed actions on IPM – action 7:

**Consultation draft of NPS**

7. Facilitate increased sharing of IPM practices between farmers and growers particularly on the management of crops which are attractive to pollinators, including on-farm demonstrations, farm walks and on-farm workshops. Defra working with CFE, LEAF, AHDB and VI. From 2014

Comments received on the Strategy's IPM proposals included that the proposals were too vague and weren't offering anything new on IPM – the actions needed to be additional to existing requirements. Many respondents wanted to see a step

change in the use of IPM by farmers. Other comments suggested that government and industry should develop a clear definition of IPM; develop crop and sector-specific protocols; provide extension services to assist farmers implement IPM; and incorporate mandatory training in IPM for all sectors into existing assurance schemes.

In the light of these comments, we would like to amend action 7 above to make a more specific offer on how best to share IPM practices with farmers and would welcome your views and agreement to work with us on this. Our aim would be to include this new action in the finalised Strategy (aiming to publish this summer) and then to work out the exact details with you in the early stages of implementation.

At this stage, I'd welcome your in-principle agreement to the proposed new action to replace action 7:

Defra will work with HSE/CRD, CFE, LEAF, AHDB, VI and others to set up a (series of?) workshop(s) on IPM [to share case studies, crop protocols and other methods of production] aimed at farmers, growers, advisers, agronomists, colleges and trainers. We could also invite Red Tractor reps on food assurance possibilities (encourage them to strengthen their environmental offer to include pollinators?).

Based on this outline, I'd particularly welcome your views on:

1. Rather than inviting farmers and growers (who would still have access to on-farm demos, farm walks and on-farm workshops – we could retain this aspect of action 7 in the strategy) should this new action be targeted at advisers, agronomists, colleges and trainers (plus food assurance schemes)?
2. Should we have a series of workshops – across 3 or 4 regions – to reflect different types of agriculture (crop protocols and case studies)?
3. Could we hold the first of these workshops in 2014/15? Defra could provide funding for a venue. We might be able to secure some sponsorship (would NFU help to co-fund?)?
4. Could we identify a widely-read farmers' journal/magazine to capture the crop protocols and case studies from these workshops and cascade to a wide readership?
5. Any other ideas?

In relation to 'other methods of production', we would also invite the Soil Association to be part of these workshops, as they have been critical that the Strategy does not mention organic production or the evidence of how this supports pollinators. Hence the workshops would be on IPM and other methods of production to support pollinators. I will contact the Soil Association to see if they agree to be part of this new action.

With apologies for the short notice, I'd welcome any views on this new action and your in-principle agreement to include it in the final version of the Strategy by 16 May if possible.

Many thanks

Please note new phone number from 16 December

██████████ (Defra official)

To Defra officials, Natural England officials, Horticultural Trade Association representatives, and Country Land and Business Association Limited, from NFU representative  
16/05/14 17:18

**National Pollinator Strategy - proposed new action directed at farmers and growers**

Hi [redacted] (Defra official)

Regarding your proposal to for a new additional action, to basically be involved in setting-up workshops on best practice to support pollinators, we kind of agree with it in principle, but actually I am not entirely clear how, from our point of view, it is much different from the existing priority action (4) to develop and implement a programme of pollinator events on farm (led by the CFE).

**With respect to the CFE, we have concerns about further event/workshop overload and overburdening a limited CFE resource on top of what has already been agreed with Defra.** We only have a finite amount of days for the Regional CFE Coordinators in each county and are already being asked to deliver an awful lot for that. If we can double up with other messages and partners (and their budgets and time in kind) then ok, but there is only so much we can do. There are lots of environmental challenges the CFE is being seen as a solution to – pollinators is just one of them. **The CFE can deliver on the new action, but only within the bounds of existing CFE resource and budget.** If we have to reopen the CFE Delivery Plan then we'll need to ask for additional budget.

To avoid the potential of workshop overload for farmers and growers, it may be more appropriate to target advisers and agronomists.

Another concern is the inclusion of Red Tractor – Red Tractor is first and foremost about food safety. It includes protection of the environment, but it purposefully does not cover additional measures that are specifically standalone environmental measures or enhancements. And Red Tractor assurance already covers things like the code of practice on pesticide use (which covers things like the requirement for continuing professional development and training), and it will doubtless take account of the NAP. So, much of what we are talking about is already embedded in Red Tractor assurance (though it is probably not widely understood that Red Tractor covers this) . **So we do not think it appropriate to further gold plate this existing good practice, stewardship and auditing of regulatory requirements with unclear aims around pollinators.** What exactly would you audit? We do not think it appropriate to use assurance schemes as a mechanism to push additional measures for pollinators. The audit burden is already significant enough as it is.

With respect to NFU sponsorship, in-kind support may be possible, but I am not sure about direct financial support. The NFU's support of the CFE over the last 5 years and going forward has been significant, and the CFE is our flagship contribution to addressing these sorts of challenges. If perhaps some of the other NGO's spent more money on positive constructive working than negative campaigning that would free up some funds.

With respect to disseminating case studies and best practice – we already do that via CFE and NFU publications and I'd imagine we would be happy to continue to give that support (our monthly magazine goes to all 55,000 farmer and grower members).





3. Could we hold the first of these workshops in 2015 – we'd need to wait until the call to action advice is more fully developed and also when the new CAP is pinned down? Defra could provide funding for a venue. We might be able to secure some sponsorship (would NFU help to co-fund?)?

4. Could we identify a widely-read farmers' journal/magazine to capture the case studies from these workshops and cascade to a wide readership?

5. Any other ideas?

With apologies for the short notice, I'd welcome your views on this new action and your in-principle agreement to include it in the final version of the Strategy by 16 May if possible.

Many thanks

Please note new phone number from 16 December

██████████ Defra official)



To Members of the Pollinator Advisory Steering Group (including representative from National Farmers Union) from Defra Official  
19/05/14 17:42

**National Pollinator Strategy - update note post consultation**

For attention of core stakeholders for National Pollinator Strategy (NPS)

Dear all,

We're working on the responses to the consultation including the workshops and attach an update note on 2 issues – the new text for the simple actions which we have cleared within Defra and a proposed approach to developing awards for pollinators.

We can discuss the options for awards further when we meet on 4 June. An agenda and other papers for that meeting will be issued next week.

Regards

Please note new phone number from 16 December

██████████ (Defra official)  
Attachment - 190514

**Document 190514**

**National Pollinator Strategy – update note to core stakeholders May 2014**

This note seeks to update the NPS core group of stakeholders on a couple of details that we're amending in the light of the consultation responses and/or workshops. We're working on several other issues in the light of the consultation and will provide a fuller update in time for our meeting on 4 June. The two issues covered in this note are:

- (1) revised set of simple actions for the call to action which we have cleared within Defra. These will feature in the animation and in the final Strategy; and,
- (2) our proposal for a Champion of Champion award (for priority action 12) where we would need many of you to participate (see details below).

Any comments on (2) are welcome. In particular, do you agree in principle with the broad outline of our proposal on awards? Any other suggestions for a title for this 'Champion of Champion' recognition award?

**Revised set of simple actions**

Following comments received from the core group and also from the public at the workshops on the animation, we will be making some changes to the animation including making it more policy neutral and also changes to the simple actions to take, as follows:

' ...Whether you live in an urban or rural environment, you can help create or expand habitat for pollinators by taking simple actions now:

- Grow more flowers, shrubs and trees that provide nectar and pollen as food for bees and other pollinators throughout the year. Examples of good plants for pollinators include primroses and crocuses for the spring, heathers and daisies for the summer, and ivy and butterfly bushes for the autumn.
- Leave patches of land to grow wild and provide other food sources (such as leaves for caterpillars) or breeding places
- Leave patches of land undisturbed or bare to provide nesting or hibernating places
- Cut grass and hedges less often so that plants can flower
- Avoid disturbing or destroying nests, in places like trees, dead wood or walls
- Think carefully about whether to use pesticides where pollinators are active or nesting or where plants are in flower. If you choose to use a pesticide, always follow the label instructions.'

#### **Our proposal on awards and competitions (priority action 12 in the draft NPS)**

In the light of our work over the last 2-3 months to develop options on competitions/awards for the Strategy (ie, priority action 12 in the draft strategy), it is clear that there are many competitions or award out there which are doing good things for pollinators, including:

- RHS Britain in Bloom awards which in 2014 are promoting yellow RHS Perfect for Pollinators plants and in future years may introduce further pollinator friendly elements in future years (target – gardeners, community groups, local authorities);
- The Coop's pollinator patches competition (with Plantlife) (target - community groups);
- Heritage Lottery Funding for schools to grow pollinator-friendly plants £1.3m to support 260 schools (target – schools);
- Woodland Trusts – free or subsidised packs of trees for pollinators to community groups and farmers/landowners (may also offer to subsidised packs local authorities in due course);
- CIRIA's Big Challenge awards 2014 will include a pollinator category (target – construction sites/developers);
- HTA's Cultivation Street 2014 will include a Pollination Street theme (target – community groups).

In addition, there are other initiatives such as free wild flower seeds from Kew as part of their Grow Wild campaign, and the possibility of new initiatives in the light of the NPS.

Over the last few months, we have been investigating whether/how Defra could set up an NPS competition to kick off the call to action campaign. In the light of these many other competitions, it is difficult to make the case internally for Defra to set up another competition in an already crowded field. To help us make the case internally, we've been looking to secure sponsors to help us co-fund a competition. So far we've not managed to secure any commitments to co-funding (although discussions with potential sponsors are underway).

What to include on competitions and awards in the final version of the NPS? Instead of an action to set up a new competition, we're now minded for this action to be a pollinator champion (of champion) award ceremony (possibly once a year) to celebrate all the various competitions/awards on pollinators, and to attract lots of publicity. The aim would be for our core stakeholders and partners in the Strategy, including CIRIA and HTA, to nominate pollinator champions in community groups, schools, local authorities, gardeners, woodland managers, farmers and growers (over the previous 12 months or who have won a pollinator competition, eg, pollinator patches by the Coop).

The Strategy does not have to go into the detail of how this would work, such as the specific categories, as we can decide these details during the early stages of implementation. We just have to signal the intention to have a pollinator Champion of Champion award ceremony in the final version of the Strategy. In practice we'd want to keep this simple. One suggestion on how it could work is as follows:

- Each of the stakeholders (who agree to offer their competition winners to the National Pollinator Strategy Champion of Champion award) would put forward their champion/competition winner/nominee to Defra;
- Defra would either select the Champion of Champion or possibly ask the public to decide through social media?
- Defra would invite all nominees and the stakeholders, plus sponsors of the original competition (if relevant) to the National Pollinator Strategy Champion award ceremony;
- Defra would host the ceremony and our Minister or another VIP would announce the Champion of Champion (and runner up?). We may be able to offer a small trophy (tbc)?

This is just one idea of how this award could work in practice. We're happy to work with you on others ideas as an early priority during implementation.

Defra

19 May 2014

**To Members of the Pollinator Advisory Steering Group (including representative from National Farmers Union) from Defra Official**  
29/05/14 15:02

**Progress meeting with core stakeholders 4 June**

Please find attached the agenda and papers for the meeting on 4 June to discuss progress with the National Pollinator Strategy. We are finalising another paper (1b) which will be sent out tomorrow or early next week.

If you are intending to send an alternative representative and have not yet let me know, please can you do so by the end of **Monday 2<sup>nd</sup> June**. At the moment I know that [REDACTED] [REDACTED] will attend for the Bumblebee Conservation Trust and [REDACTED] for the Soil Association.

If you aren't able to attend the meeting but would like to send in comments on any of the papers, please email them through to me and copy to [REDACTED] and [REDACTED] by end of Tuesday 3 June, if you wish us to discuss your comments during the meeting.

I look forward to meeting you on 4 June. If you have any queries or need directions to Nobel House please let me know. We are currently making changes to the entrance area. The visitors' entrance is still on Smith's square but it is on the right under the scaffolding.  
Attachments - 290514-1, 290514-2, 290514-3, 290514-4, 290514-5

[REDACTED] (Defra official)

**To Members of the Pollinator Advisory Steering Group (including representative from National Farmers Union) from Defra Official**  
02/05/2014 9:34

Hi

The best time/date for the national pollinator strategy catch-up from the doodle poll is 4 June from 11am to 1pm. The meeting will be held in Room G22B in Nobel House.

The agenda and any papers for discussion will be issued the week before the meeting.

[REDACTED] [REDACTED] (Defra official)

**Document 290514-1**

**National Pollinator Strategy – core stakeholder group  
Meeting on 4 June 2014  
11:00 – 13:00 room G22B Nobel House  
Defra, London  
Agenda**

No.	Item	Introduced by	Time	Purpose
1.	Welcome and introductions		11:00	Information
2.	Progress with consultation responses and strategy (papers 1a and 1b)		11:05	Information
3.	Environmental Audit Committee Inquiry		11.20	Information
4.	Call to action and animation script (paper 2); awards/competition		11.30	Information
5.	High level statement of collective action and cooperation (paper 3)		11.50	Decision
6.	Strategy governance (paper 4)		12:00	Decision
7.	Pesticides update		12:10	Information
8.	Asian hornet		12:50	Request
9.	AOB and close		12:55	

**Document 290514-2 – attached separately**

**Document 290514-3**

Purpose of paper: This is the stripped back high level statement which was circulated for the roundtable with Lord de Mauley in April and has been refined to show academic partners separately following comments from members.

The statement sets out the commitment of the core leadership group of stakeholders and government (ie, the signatories below) to work positively together on NPS implementation to support our pollinators, including the call to action. It would highlight to the public the collaborative nature of the Strategy and the opportunities for them and members of the NGO signatories to take actions to support pollinators, aligned with the Strategy's vision, aims and actions. It also shows that we are working with academic partners.

The statement would be used as part of the communication plan for the launch of the Strategy in the summer and/or could be included as part of the Foreword of the Strategy. Issues to consider: are you happy to be part of this core leadership group (and a signatory of the Statement), and therefore to engage fully and positively in guiding and steering implementation? Would you be happy for this Statement to be included in the Foreword?

**We, the signatories commit to:**

- Working together to support implementation of the National Pollinator Strategy, given its collaborative nature and its intention of inspiring action to support pollinators at all levels by many other organisations and individuals.
- Ensuring that our public campaigns and land management plans promote, and are consistent with the Bees' Needs message and advice.

Academic partners include the University of Cambridge, the Centre for Ecology and Hydrology and (the University of Reading – tbc).

### Signatories

Buglife, Bumblebee Conservation Trust  
Friends of the Earth  
Waitrose  
Soil Association  
National Farmers' Union  
Campaign for the Farmed Environment –tbc  
Royal Horticultural Society  
British Beekeepers' Association  
Bee Farmers' Association  
The Wildlife Trusts  
Country Land and Business Association  
National Trust  
National Federation of Women's Institutes Pesticide Action Network UK  
Natural England, Defra

Document 290514-4

Paper 4 – 4 June meeting

## **Governance and Strategy implementation**

The implementation of the National Pollinator Strategy will rely on strong partnership and communication between multiple groups both inside and outside of Government. Delivery will be overseen by the **Pollinator Programme Board**, composed of policy leads within Defra. Reporting to the Programme Board are:

**Pollinator Strategic Evidence Group** which assesses the evidence actions defined within the National Pollinator Strategy.

**Pollinator Advisory Steering Group** composed of key stakeholders.

**Four Countries Biodiversity Group** communicating and coordinating with the Devolved Administrations.

Each of these then works with further groups within different policy areas to ensure the successful implementation of the Strategy.

### **Delivery**

The NPS Governance structure has the role of setting objectives and Key Performance Indicators in order to define what success looks like in the implementation of the Strategy. Over the period of a year it will monitor progress made and review whether objectives are being met. Following this first year of implementation, the structure will be disbanded and the Pollinator Programme Board will take on the responsibility of monitoring delivery.

### **Measuring success**

Progress will be measured by monitoring delivery of the Evidence actions and Priority actions. Given the urgency of acquiring further evidence and reversing pollinator decline, delivering these actions on time and to a high quality is particularly crucial. It is, however, important to keep in mind the broader vision of the Strategy, and ensure that all of the actions are delivering for pollinators. This can be measured by considering the key outcomes defined at the start of the Strategy. That is:

1) More, bigger, better, joined-up, diverse and high-quality flower-rich natural or semi-natural habitats (including nesting places and shelter) supporting our pollinators on farmland and public land, in towns, cities and gardens, along transport networks and on land surrounding other infrastructure.

- 2) resilient healthy bees and other pollinators to support pollination services;
- 3) no further human-induced extinctions of known threatened pollinator species;
- 4) enhanced awareness across a wide ranges of businesses, other organisations and the public of the essential needs of pollinators and evidence of actions taken to support them.

**Document 290514-5**

**Pollinators animation script – revised draft following input from the public consultation on the Strategy** [DN – still be to be finalised with animator]

**SCRIPT STARTS**

**Why do bees matter?**

Most bees are pollinators. They eat pollen and nectar from flowers. When the pollen sticks to their bodies, it gets transferred between the flowers they visit. This fertilises the plants in the process, allowing them to reproduce, and grow fruits and seeds.

This process is called pollination. Insects, like bees, that transfer pollen between plants are known as pollinators.

There are at least 1500 species of insect pollinators in the UK. Some, like honey bees, live in hives, managed by beekeepers. Others, like many bumblebees, solitary bees, moths, butterflies and hoverflies are wild pollinators.

Some crops, like raspberries, apples and pears, particularly need insect pollination to produce good yields of high quality fruit. If pollinator populations decline, it is unlikely we will run out of food.

But pollinators do help provide variety in our diets and are important for biodiversity and a healthy ecosystem. They are also highly valued by the public.

### **What's the problem with pollinators?**

Evidence suggests that many species of pollinator may be in decline.

However, as we don't know exactly how many wild pollinators we have now, or how many we had in the past, it's difficult to be certain about the rate of potential changes to pollinator populations, or the causes of change.

For example, we do know that of the 25 bumblebee species in the UK, two are considered extinct and eight are now found in a much smaller area of the UK. Whilst at the same time, two more species have arrived.

We also know that although the total number of honey bee colonies has increased over the last few years, along with the number of beekeepers, beekeepers reported losing a third of their colonies over both the winters of 2007 and 2012, a greater loss than is usually expected. However, unlike wild pollinators, these managed honey bees can be replaced when colonies are lost.

Overall, our interpretation of the evidence is that wild bees and other pollinators are generally less abundant and widespread than they were a few decades ago.

### **What's causing the problem?**

We know that pollinators face many threats, including habitat loss, disease, extreme weather, climate change and use of some pesticides. While there are uncertainties about the impacts of these threats, overall the evidence suggests that it is probably the combination of these many threats that could be reducing populations of some species in the wild.

Training is already available to help beekeepers limit disease in managed hives.



But evidence suggests that loss of flower-rich habitat, linked to urbanisation, industrialisation and intensive agriculture, increases the impact of all other pressures.

Therefore, of all the threats facing wild bees and other pollinators, habitat change is probably the most significant.

Because bees need food and a home to survive.

### **What can we do?**

Over the next few years, conservationists, land managers, businesses, farmers, gardeners, the Government and others will help implement a National Pollinator Strategy.

Our plan is to invest in research and monitoring, to find out which pollinator populations are changing, what is causing this change, and which interventions help most.

In the meantime, we are producing advice on how to create habitat for bees.

Fulfilling bees' needs with food and a home is likely to help all pollinators.

Whether you live in an urban or rural environment, you can help create or expand habitat for pollinators by taking simple actions now [DN- animator may need to shorten]:

- Grow more flowers, shrubs and trees that provide nectar and pollen as food for bees and other pollinators throughout the year. For example: primroses and crocuses in spring, lavenders and ox-eye daisies in summer, ivy and butterfly bushes in autumn, and mahonia shrubs and cyclamens in winter.
- Leave patches of land to grow wild throughout the year to provide other food sources (such as leaves for caterpillars) or breeding places for pollinators like butterflies and moths.
- ~~Leave patches of land undisturbed or bare to provide nesting or hibernating places.~~
- Cut grass less often and ideally remove the cuttings to allow plants to flower.
- Avoid disturbing or destroying nesting or hibernating insects, in places like grass margins, bare soil, hedgerows, trees, dead wood or walls.

**Comment** [REDACTED] Have deleted as it duplicates some of previous bullet, and also it is not clear what the instruction is for the land manager.....have tweaked penultimate bullet to pick up the theme of 'bare' and 'undisturbed'

- Text options for whether to use pesticides:
  - Either (1) Think carefully about whether to use pesticides especially where pollinators are active or nesting or where plants are in flower. Alternatively, many people choose to avoid chemicals and adopt organic methods including physically removing pests, using barriers to deter pests, or using organic-approved pesticides. If you choose to use a pesticide, always follow the label instructions.
  - Or (2) Think carefully about whether to use pesticides especially where pollinators are active or nesting or where plants are in flower. Consider adopting organic methods such as physically removing pests, using barriers to deter pests, or using organic-approved pesticides. If you choose to use a pesticide, always follow the label instructions.

Pollinators help us and together, we can help them.

**ENDS**

**Defra**

**28 May 2014**

**Comment** [redacted] 2 options as per [redacted]  
email of 28 May.

**To Members of the Pollinator Advisory Steering Group (including representative from National Farmers Union) from Defra Official**  
**30/05/14 15.36**

**Restatement of evidence base concerning neonicotinoid insecticides and insect pollinators**

For information please find attached a link to the restatement of the natural science evidence base concerning neonicotinoid insecticides and insect pollinators produced by Prof Charles Godfrey et al.

[http://rspb.royalsocietypublishing.org/content/281/1786/20140558\\_full.pdf](http://rspb.royalsocietypublishing.org/content/281/1786/20140558_full.pdf)

██████ (Defra official)

**To Members of the Pollinator Advisory Steering Group (including representative from National Farmers Union) from Defra Official**  
03/06/14 14:05

**Progress meeting with core stakeholders - 4 June**

Dear all,

Please find attached an updated version of Paper 4 (draft of the Strategy's governance structure).

We look forward to seeing you tomorrow at Nobel House at 11am.

Best Wishes,  
[REDACTED] (Defra official)  
Attachment 030614

**To Members of the Pollinator Advisory Steering Group (including representative from National Farmers Union) from Defra Official**  
30/05/14 14:22

Please find attached the final paper (1b) for our meeting on Wednesday.

[REDACTED] (Defra official)

**To Members of the Pollinator Advisory Steering Group (including representative from National Farmers Union) from Defra Official**  
29/05/14 15:02

**Progress meeting with core stakeholders 4 June**

Please find attached the agenda and papers for the meeting on 4 June to discuss progress with the National Pollinator Strategy. We are finalising another paper (1b) which will be sent out tomorrow or early next week.

If you are intending to send an alternative representative and have not yet let me know, please can you do so by the end of **Monday 2<sup>nd</sup> June**. At the moment I know that [REDACTED] [REDACTED] will attend for the Bumblebee Conservation Trust and [REDACTED] [REDACTED] for the Soil Association.

If you aren't able to attend the meeting but would like to send in comments on any of the papers, please email them through to me and copy to [REDACTED] and [REDACTED] by end of Tuesday 3 June, if you wish us to discuss your comments during the meeting.

I look forward to meeting you on 4 June. If you have any queries or need directions to Nobel House please let me know. We are currently making changes to the entrance area. The visitors' entrance is still on Smith's square but it is on the right under the scaffolding.

██████ (Defra official)

**To Members of the Pollinator Advisory Steering Group (including representative from National Farmers Union) from Defra Official**  
02/05/2014 9:34

Hi

The best time/date for the national pollinator strategy catch-up from the doodle poll is 4 June from 11am to 1pm. The meeting will be held in Room G22B in Nobel House.

The agenda and any papers for discussion will be issued the week before the meeting.

██████ ████████ (Defra official)

**Document 030614**

## **Governance and Strategy implementation**

The implementation of the National Pollinator Strategy will rely on strong partnership and communication between multiple groups both inside and outside of Government. Delivery will be overseen by the **Pollinator Programme Board**, composed of policy leads within Defra. Reporting to the Programme Board are:

**Pollinator Strategic Evidence Group** whose role it is to oversee the evidence requirements for pollinators and evaluate the quality of this evidence. The Group will coordinate with the relevant policy areas and evidence groups both inside and outside of Defra, and communicate with impact to the Department's Chief Scientific Advisor and Ministers.

**Pollinator Advisory Steering Group** the core leadership group of stakeholders working with Government officials to steer implementation and delivery of the Strategy. The Group will consider emerging and new evidence from the planned monitoring programme and commissioned research and review the implications for policy development. It will identify and consider lessons learned from the initial policy actions and from partnership working, and how to adapt and improve as necessary. In addition, the Group will play an important role in keeping Government abreast of any outside developments of significance to pollinators

**Four Countries Biodiversity Group** whose responsibility it is to communicate and coordinate with the Devolved Administrations.

Each of the above then works with further groups within different policy areas to ensure the successful implementation of the Strategy (see organograms below).

### **Delivery**

The NPS Governance structure has the role of setting objectives and Key Performance Indicators in order to define what success looks like in the implementation of the Strategy. Over the period of at least 12 months it will monitor progress made and assess whether objectives are being met. Following this first year of implementation, the governance structure will be reviewed. It will also be considered whether involvement of further stakeholders would be beneficial.

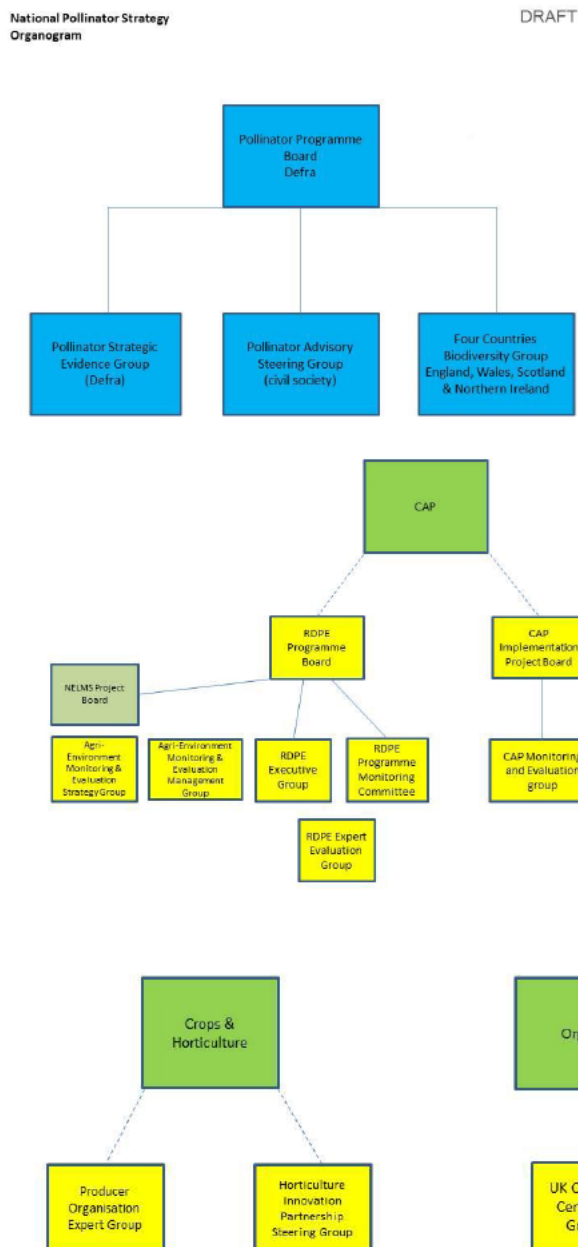
### **Measuring success**

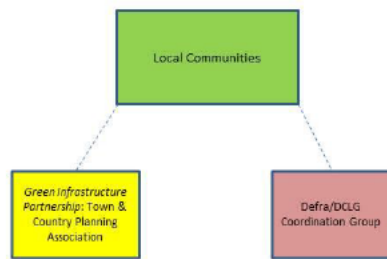
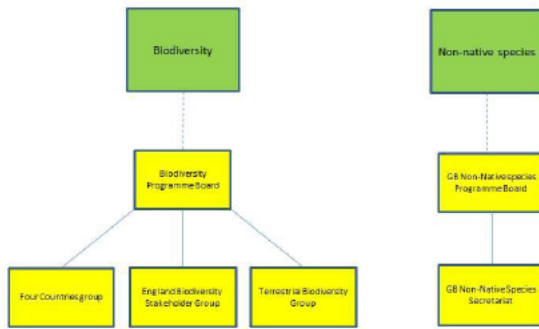
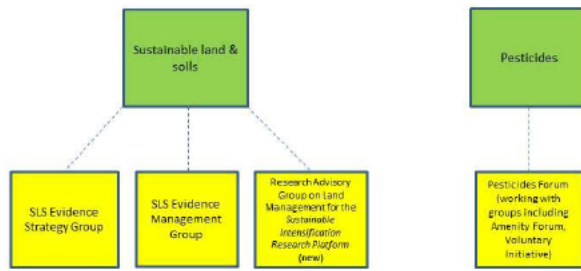
Progress will be measured by monitoring delivery of the Evidence actions and Priority actions. Given the urgency of acquiring further evidence and reversing pollinator decline,

delivering these actions on time and to a high quality is particularly crucial. It is, however, important to keep in mind the broader vision of the Strategy, and ensure that all of the actions are delivering for pollinators. This can be measured by considering the key outcomes defined at the start of the Strategy. That is:

- 1) More, bigger, better, joined-up, diverse and high-quality flower-rich natural or semi-natural habitats (including nesting places and shelter) supporting our pollinators on farmland and public land, in towns, cities and gardens, along transport networks and on land surrounding other infrastructure.
- 2) resilient healthy bees and other pollinators to support pollination services;
- 3) no further human-induced extinctions of known threatened pollinator species;
- 4) enhanced awareness across a wide ranges of businesses, other organisations and the public of the essential needs of pollinators and evidence of actions taken to support them.

### National Pollinator Strategy Governance Structure





To Defra officials from NFU representative  
06/06/14 18:25

#### Feedback on papers discussed at NPS core stakeholder group

Hi

Firstly, for your info, please find attached a copy of the response to EAC inquiry I put together. It basically is just things we said in our response to the main NPS consultation.

I've also attached comments on the animation script – paper 4.

Our main concerns here are

- 1) About being clearer about when declines happened – and I think we came to quite a simple neat agreement during the meeting on this by simply referring to 'since the 1950s' rather than the last 'few decades'.
- 2) About the way the term 'organic' is used in the 'text options for whether to use pesticides'

The NFU represents both organic and conventional growers and we are just looking for fair representation. I am somewhat bemused at how we have gone from a situation where organics was not mentioned (an oversight admittedly) to where it is being promoted in one of the key pieces of public-facing messaging – the animation. And promoted as an alternative to pesticide use – which is wrong in many ways.

Statement 1 basically juxtaposes using pesticides with not using pesticides, and effectively promotes that this equals organic methods. **This panders to the public misconception that organic production means no pesticides.** When the fact is that organic production means many things, one of which is a much reduced reliance on chemical pesticides. I realise the word 'avoid' is used in statement 1, but the public will not pick up on this nuance and will read this as saying 'don't use pesticides - adopt organic methods instead' which implies organic = pesticide-free.

The next issue is that the 'non-pesticide methods' talked about, like physically removing pests or using barriers, **are not organic methods** – they are cultural methods that are of course suitable for use in organic or any other type of production – they are not the preserve of organic production.

The reaction of PAN, FoE, Soil Association in wanting to remove the 'organic-approved pesticides' bit makes it clear to me that they do not want any association between organic and pesticides. But if you google organic pesticides you get a shed-load of hits. **There are plenty of bug sprays labelled as organic available on the shelves for gardeners. Are we saying don't use these sprays?** I think this would be confusing for the public.

**Fundamentally these text options are about whether or not to use pesticides, and what the alternatives are, they must not be hijacked to promote organic production.** So we think the best option is to say something like



**'Think carefully about whether to use pesticides especially where pollinators are active or nesting or where plants are in flower. Many people choose to avoid chemicals and adopt methods like physically removing pests, using barriers to deter pests, or using organic pest and disease sprays. If you choose to use a pesticide, always follow the label instructions.'**

Finally, I would just like to make clear our frustration with the circular argument, used by the likes of FoE, that because the public are concerned about the issue of pesticides and pollinators the NPS needs to be stronger on the issue of pesticides and pollinators. As I made clear at the meeting – we disagree with the FoE view that Government has backed itself into a corner on this. It is the environmental organisations like FoE who have backed themselves into a corner because the public concern about pesticides, which they were complicit in stirring-up, **is a concern based on significant misrepresentation of the evidence by environmental NGOs**. This public concern is not evidence-based, so we must not allow it to drive changes in evidence-based policy.

Kind regards and have a great weekend.

█ (NFU representative)  
Attachments – 060614-1, 060614-2

**Document 060614-1**

To: Environmental Audit Committee

Date: 3 June 2014

Subject:

Ref:

Contact: █

Tel: █

Fax: █

Email: █

## **NFU submission to the Environmental Audit Committee's inquiry into Defra's National Pollinator Strategy**

The NFU represents more than 55,000 farming and growing members and in addition some 40,000 countryside members with an interest in the countryside and rural affairs. The NFU welcomes the opportunity to make a submission to the Environmental Audit Committee's inquiry into Defra's proposed National Pollinator Strategy.

### **Executive summary**

- 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.
- Considering the evidence we know and the many uncertainties involved in this issue, the NFU sees the proposed National Pollinator Strategy as generally providing a balanced, pragmatic, evidence-based and still challenging approach to supporting pollinators.
- The Strategy importantly also provides a clear framework for doing more as we find out more. 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.
- 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, such as pesticide use or urbanization, and that these benefits have to be taken into account when considering what measures can be taken to ease environmental pressures on pollinators. The Strategy also needs to be clear about whether such intensification is historic or current.
- A recently published independent review of the evidence around neonicotinoids and insect pollinators has stated that, while research is ongoing to better understand how neonicotinoids affect pollinator colonies and populations, '...there is at present a limited evidence base to guide policy-makers'.
- 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.
- The NFU is already committed to promoting the uptake of management measures on farmland to benefit pollinators, under the Campaign for the Farmed Environment (CFE) and more widely. However, Government appears to be reducing the ability for farmers and growers to put in measures to benefit pollinators, by reducing future access to incentivised agri-environment schemes, and by not having weighted pollinator-focussed Ecological Focus Areas as an option under CAP greening requirements. We are concerned this puts a lot of pressure on the voluntary measures delivered by farming. This challenging situation is not clearly reflected in the National Pollinator Strategy.

### **Introductory comments**

1. The NFU has a significant interest the health and status of insect pollinators. The issue is very important to our industry in terms of crop pollination, and also pollination of wild plants and habitats within the wider countryside, many of which will fall under the management of farmers and growers.

2. The NFU has been involved in the development of Defra's National Pollinator Strategy, through the national workshop, working groups, the consultation itself, and National Pollinator Strategy stakeholder groups. The NFU also sits on the Bee Health Advisory Forum, which among other roles acts as the project board guiding implementation of Defra's Healthy Bees Plan.
3. The NFU also has the Bee Farmers' Association (BFA) as a member, which represents commercial bee farmers. Through our membership of COPA-COGECA (the EU level organisation representing farmers), the NFU works closely with the BFA to represent the interests of UK beekeepers at a European level.

### **Research on the distribution and health of pollinator species**

4. 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.
5. The Status report makes clear the considerable uncertainties around pollinators and pollination services. The available evidence shows there is uncertainty over the status of pollinators (whether species are in decline or not), uncertainty over the possible causes of any changes in this status, and uncertainty over the implications of any changes in this status (e.g. whether the declines are actually causing problems with lack of pollination). One of the most significant statements in the whole consultation and supporting documents is found in the conclusion of the Status report, and it says **'Without systematic and standardised monitoring of pollinator populations it is impossible to state unequivocally whether wild insect pollinators are in decline or not.'** This statement provides a clear baseline regarding our current state of knowledge, and more importantly emphasizes the critical need to adequately fund and develop such a monitoring programme. It is essential for us to better understand how insect pollinators have declined and whether any declines are historic or ongoing. A comprehensive monitoring programme is also an essential first step to gaining a clear understanding of what specific factors are causing any declines.
6. The NFU recognizes the uncertainty around the evidence makes developing policy proposals for action very challenging. It is important for actions under the strategy to be cost-effective, and this is going to be dependent on the available evidence to demonstrate that the action is going to achieve significant net benefit. We also agree that the uncertainty over some aspects must not be used as an excuse for general inaction. Considering this challenge, the NFU believes the strategy proposes a well-balanced and reasoned response by focussing on three main elements:
  - a. *Evidence-gathering on pollinator status and impacts of pressures to provide a sound base for future policies to support 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.
  - b. *Priority policy actions in areas where we do have good existing evidence, and also to build on current initiatives (e.g. Campaign for the Farmed*

*Environment (CFE), Integrated Pest Management (IPM)) and to refocus them where appropriate on the essential needs of pollinators. These policy actions include a 'Call to Action' to provide the right information to businesses, other organisations and the public to support pollinators. 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.*

- c. *A commitment to review and refresh the strategy's aims and actions as new evidence becomes available.* The NFU sees this 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.

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.

7. Considering the evidence we know and the many uncertainties involved in this issue, the NFU sees the proposed National Pollinator 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.
8. The Status report highlights land-use intensification as one of the pressures on pollinators and pollination. In the context of the research on the distribution and health of pollinator species, the NFU believes there are two clear areas where the National Pollinator Strategy should be improved further a) acknowledging that there are benefits associated with land-use intensification, and b) being clear about when land-use intensification happened.
  - a. **Acknowledging the benefits associated with land-use intensification**
    - i. During the National Pollinator Strategy workshop in October 2013, Defra 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.
    - ii. 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<sup>6</sup> states clearly that there is a trade-off

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<sup>6</sup> <http://www.efsa.europa.eu/en/efsajournal/pub/2668.htm>

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’<sup>7</sup>, 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.

- iii. The Strategy consultation dealt with 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 included factors such as the intensification of land-use, but it failed 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 much needed new housing.
- iv. 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.
- v. 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.
- vi. 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.

**b. Being clear about when land-use intensification happened**

- i. Land-use intensification, including landscape alteration, cultivation of monocultures and agrochemical use, was 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,

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<sup>7</sup> <http://www.efsa.europa.eu/en/supporting/doc/509e.pdf>

when in actual fact there have been significant changes in policy direction and farming practice over the last 20 years.

- ii. 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.
- iii. 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.
- iv. 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.
- v. 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<sup>8</sup>. 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.
- vi. 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.

### **Research on the relationship between pollinators and pollination services in crop production**

9. The Strategy proposes to conduct a feasibility study on conducting primary research on relationship between pollinators and pollination services in crop production (Evidence action 7). 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

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<sup>8</sup> Carvalho et al. 2013 Species richness declines and biotic homogenisation have slowed down for NW-European pollinators and plants. *Ecology Letters*, 16(7):870-8

pollination deficits in orchards and the potential to increase yield<sup>9</sup>, 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 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<sup>10</sup>.

The NFU sees that it is important that work is done to better establish the value of pollination services to different UK crops.

The NFU also wants 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.

### **Research on the impact of neonicotinoid insecticides**

10. Two of the National Pollinator Strategy proposals look at neonicotinoids (Evidence actions 10 and 11) - 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 (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.
11. 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. It is vital though that this work is kept in context with respect to the available evidence and other pressures that may be impacting on pollinators. The state of the current evidence, as outlined in the Status report, is such that '...it is impossible to state unequivocally whether wild insect pollinators are in decline or not', let alone be clear about what may be causing any declines.
12. In May 2014, an international panel of scientists, led by Professor Charles Godfray and Professor Angela McLean of the Oxford Martin School at Oxford University, published an independent review of the evidence around

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<sup>9</sup> Garratt et al, 2014 Pollination deficits in UK apple orchards. *Journal of Pollination Ecology*, 12(2), 2014, pp 9-14

<sup>10</sup> 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

neonicotinoids and insect pollinators, and they called for the debate around this issue to be evidence-driven.<sup>11</sup>

13. In discussing the consequences of neonicotinoid use, the 'restatement' of the scientific evidence on neonicotinoids makes clear that while declines in the populations of many insect species in general and pollinators in particular have been observed, the declines in bees predate by some decades the introduction of neonicotinoid insecticides, and that there is also some evidence of a recent slowing or even reversal in the rate of decline for some pollinator groups (as mentioned in point 8b(v) above). It goes on to say that the evidence available does not allow us to say whether neonicotinoid use has had any effect on these trends since their introduction.
14. The limited evidence base around neonicotinoids relies heavily on experiments where bees are artificially exposed to neonicotinoids. The critical issue is whether this experimental exposure is representative of what pollinators are likely to experience in real-life situations. The restatement makes it clear that most studies have used artificial doses at the high end of those expected in the field. This is then further compounded by the fact exposed bees also receive the doses in an artificial environment that affects their behaviour and further brings into question how representative the results are of normal field situations.
15. The last sentence of the restatement makes the situation very clear – while significant research is being currently undertaken to try and better understand how using or not using neonicotinoids affects pollinator colonies and populations '...there is at present a limited evidence base to guide policy-makers'.
16. Some organisations have looked at the National Pollinator Strategy as way of getting Government to set policy actions around reducing pesticide use. This is in direct response to concerns around the impacts of neonicotinoids on pollinators. It is very clear from the independent restatement of the evidence on neonicotinoids that such approaches are not justified by the available limited evidence base.

#### **The role of private gardeners and agriculture; Integrated Pest Management and the use of CAP greening measures**

17. The NFU supports the Strategy's 'Call to Action' that rightly focuses on simple actions around providing food and shelter for pollinators. Many stakeholders, including private gardeners and agriculture, but also local authorities, highways, utilities, land use, planning and development sectors, will all need to play an active role in delivering the 'Call to Action' package if the Strategy is to be successful.
18. Considering that 70% of the UK landscape is farmland, and considering how land use intensification associated with farmland is recognised as a pressure on pollinator populations, it is understandable that the National Pollinator Strategy includes 6 proposed policy actions specifically focussed on the management of farmland:

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<sup>11</sup> Godfray HCJ, Blacquiere T, Field LM, Hails RS, Petrokofsky G, Potts SG, Raine NE, Vanbergen AJ, McLean AR. 2014 A restatement of the natural science evidence base concerning neonicotinoid insecticides and insect pollinators. Proc. R. Soc. B 281: 20140558. <http://dx.doi.org/10.1098/rspb.2014.0558>



- a. Ensure pollinators are a key focus of CAP reform under Pillars I and II, and in the development of targeted voluntary actions (e.g. Campaign for the Farmed Environment)
- b. Secure commitment of farm advice providers to draw on the 'Call to Action' package for pollinators
- c. Develop and implement on-farm pollinator events, led by CFE and supported by the new CFE leaflet 'Pollinator management for your farm business'
- d. Review and update Integrated Pest Management (IPM) guidance and information, and distribute it to farmers (led by HSE working with others)
- e. The Voluntary Initiative (VI) to revise and re-publish guidance on insecticide best practice, and make sure annual spray operators training includes 'more detailed coverage on the responsible use of insecticides'
- f. Facilitate increased sharing of IPM practices between farmers and growers, including on-farm demonstrations, walks and workshops (led by Defra working with CFE and others)

So the strategy proposes that farmers and growers can help support pollinators in two main ways 1) the uptake of IPM, and 2) by providing measures that offer food and shelter resources for pollinators.

19. 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.
20. The industry has already made some significant progress on IPM. The new VI IPM plan has been developed to demonstrate how UK farmers and growers are using IPM practices. The Strategy proposals will build on this achievement to further progress promotion, use and development of IPM.
21. 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.
22. The Strategy states that the second main role for farmers and growers – to manage farmland to provide food and shelter resources for pollinators – can generally be achieved in three different ways 1) via mandatory greening measures (CAP Pillar I), 2) via voluntary measures (e.g. under CFE), or 3) via incentivised agri-environment schemes (CAP Pillar II).
23. **There are some significant challenges around the pollinator-friendly management of farmland, which the Strategy fails to adequately acknowledge.** 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.

24. The Strategy consultation stated 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 stated that this action will be a balance of the incentivized, voluntary and regulatory activity (i.e. mandatory greening measures). However, during the course of the consultation period it became increasingly clear to the NFU that, because of the restrictive wording of the EU regulation, Defra 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.
25. 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.
26. So, while the consultation stated 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.
27. 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.
28. 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.
29. 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 was 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.

## **Honeybees**

30. Under the proposed Strategy, two policy priority actions (15 and 16) focus on improving the health of honeybees. The NFU supports the work being done under the Healthy Bees Plan and sits on the Bee Health Advisory Forum that oversees its implementation. However, five years after 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 honeybee 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.

**Document 060614-2**

**Pollinators animation script – revised draft following input from the public consultation on the Strategy** [DN – still be to be finalised with animator]

### **SCRIPT STARTS**

#### **Why do bees matter?**

Most bees are pollinators. They eat pollen and nectar from flowers. When the pollen sticks to their bodies, it gets moved? between the flowers they visit. This fertilises the plants in the process, allowing them to reproduce, and grow fruits and seeds.

This process is called pollination. Insects, like bees, that move? pollen between plants are known as pollinators.

There are at least 1500 species of insect pollinators in the UK. Some, like honey bees, live in hives, managed by beekeepers. Others, like many bumblebees, solitary bees, moths, butterflies and hoverflies are wild pollinators.

Some crops, like raspberries, apples and pears, particularly need insect pollination to produce good yields of high quality fruit.

If pollinator populations decline, it is unlikely we will run out of food. But pollinators do help provide variety in our diets and are important for biodiversity and a healthy ecosystem. They are also highly valued by the public.

### **What's the problem with pollinators?**

Evidence suggests that many species of pollinator may have declined.

However, as we don't know exactly how many wild pollinators we have now, or how many we had in the past, it's difficult to be certain about the rate of potential changes to pollinator populations, or the causes of change.

For example, we do know that of the 25 bumblebee species in the UK, since the 1920s two have become extinct and eight are now found in a much smaller area of the UK. Whilst at the same time, two more species have arrived.

We also know that although the total number of honey bee colonies has increased over the last few years, along with the number of beekeepers, beekeepers reported losing a third of their colonies over both the winters of 2007 and 2012, a greater loss than is usually expected. However, unlike wild pollinators, these managed honey bees can be replaced when colonies are lost.

Overall, our interpretation of the evidence is that wild bees and other pollinators are generally less abundant and widespread since the 1950s.

### **What's causing the problem?**

We know that pollinators face many threats, including habitat loss, disease, extreme weather, climate change and use of some pesticides. While there are uncertainties about the impacts of these threats, overall the evidence suggests that it is probably the combination of these many threats that could be reducing populations of some species in the wild.

Training is already available to help beekeepers limit disease in managed hives.

**Comment [REDACTED]** We need to be clear about what we know about when declines happened. The evidence tells us declines have happened since the 1950's, and they have slowed, but we do not know. So the evidence suggests the bulk of decline is historic rather than ongoing. We must be careful of not propagating the media hype that pollinators are on a cliff edge or already gone over the cliff. We do not have the evidence to back this up.

**Comment [REDACTED]** Again – this reads like it is a current problem, yet the evidence shows 50% of these extinctions (B. cullumanus) happened over 80 years ago in the 20s-30s. Also the other 50% of extinctions – B. subterraneus – is the subject of a very active re-introduction programme.

**Comment [REDACTED]** More or less every beekeeper will tell you that the 2007 and 2012 overwintering losses were weather-related.

Are we looking to tackle the weather under the NPS? No – so we need to be careful about how we refer to this honeybee information. Please let's not use the FoE tactic of using these honeybee overwintering losses to highlight the problems with pollinators - we are confusing the issues.

**Comment [REDACTED]** At a significant cost to the beekeeper, which is not necessarily sustainable.

**Comment [REDACTED]** Again, lets be clear about the evidence we have and not give the impression that decline are current and rampant. The change I've made here was suggested by [REDACTED]

But evidence suggests that loss of flower-rich habitat, linked to urbanisation, industrialisation and intensive agriculture, increases the impact of all other pressures.

Therefore, of all the threats facing wild bees and other pollinators, habitat change is probably the most significant.

Because bees need food and a home to survive.

### **What can we do?**

Over the next few years, conservationists, land managers, businesses, farmers, gardeners, the Government and others will help implement a National Pollinator Strategy.

Our plan is to invest in research and monitoring, to find out which pollinator populations are changing, what is causing this change, and which interventions help most.

In the meantime, we are producing advice on how to create habitat for bees. Fulfilling bees' needs with food and a home is likely to help all pollinators.

Whether you live in an urban or rural environment, you can help create or expand habitat for pollinators by taking simple actions now [DN- animator may need to shorten]:

- Grow more flowers, shrubs and trees that provide nectar and pollen as food for bees and other pollinators throughout the year. For example: primroses and crocuses in spring, lavenders and ox-eye daisies in summer, ivy and butterfly bushes in autumn, and mahonia shrubs and cyclamens in winter.
- Leave patches of land to grow wild throughout the year to provide other food sources (such as leaves for caterpillars) or breeding places for pollinators like butterflies and moths.
- ~~Leave patches of land undisturbed or bare to provide nesting or hibernating places.~~

**Comment** [redacted] Have deleted as it duplicates some of previous bullet, and also it is not clear what the instruction is for the land manager.....have tweaked penultimate bullet to pick up the theme of 'bare' and 'undisturbed'

- Cut grass less often and ideally remove the cuttings to allow plants to flower.
- Avoid disturbing or destroying nesting or hibernating insects, in places like grass margins, bare soil, hedgerows, trees, dead wood or walls.
- Text options for whether to use pesticides:
  - Either (1) Think carefully about whether to use pesticides especially where pollinators are active or nesting or where plants are in flower. Alternatively, many people choose to avoid chemicals and adopt organic methods including physically removing pests, using barriers to deter pests, or using organic-approved pesticides. If you choose to use a pesticide, always follow the label instructions.
  - Or (2) Think carefully about whether to use pesticides especially where pollinators are active or nesting or where plants are in flower. Consider adopting organic methods such as physically removing pests, using barriers to deter pests, or using organic-approved pesticides. If you choose to use a pesticide, always follow the label instructions.

Pollinators help us and together, we can help them.

ENDS

Defra

28 May 2014

Comment [redacted] 2 options as per [redacted] email of 28 May.

Comment [redacted] I am somewhat bemused at how we have gone from a situation where organics was not mentioned (an oversight admittedly) to where it is being promoted in one of the key pieces of public-facing messaging – the animation.

The NFU represents both organic and conventional growers and we are just looking for fair representation.

Statement 1 basically juxtaposes using pesticides with not using pesticides, and promotes that this equals organic methods.

This panders to the public misconception that organic production means no pesticides. When the fact is that organic production means many things, one of which is a reduced reliance on chemical pesticides.

I realise the word 'avoid', is used in statement 1, but the public will not pick up on this nuance and will read this as saying 'don't use pesticides and adopt organic methods'.

The Soil Association organic standards say that "You must not use phrases such as 'pesticide free' unless you can prove this, if challenged.

Note - we suggest you use:

- ☑ 'organic agriculture aims to avoid the use of artificial pesticides and fertilisers'
- ☑ 'organic standards restrict the use of artificial pesticides and fertilisers', or
- ☑ 'grown under organic standards which minimise the use of artificial pesticides and fertilisers'.

We think statement version 1 sets up the misconception that organic = pesticide-free. So for that reason statement version 2 is favourable.

The second issue is the non-pesticide methods talked about like physically removing pests or using barriers are not organic methods – they are cultural methods suitable for use in organic or any other type of production – they are not the preserve of organic production.

The reaction of PAN, FoE, Soil Association to removing the 'organic-approved pesticides' makes it clear their strategy to make organic appear as equalling 'pesticide-free'. If you google organic pesticides you get a shed-load of hits. There are plenty of organic bug sprays available on the shelves for gardeners. Are we saying don't use these sprays? I think this would be confusing for the public.

...

To the National Pollinator Strategy mailbox from Defra Official  
10/06/14 18:00

**NPS workshop: Restatement of evidence**

In the consultation workshops we mentioned a restatement of evidence that was being prepared and we offered to send you a link when it was published. It has now been published and the link to the restatement of the natural science evidence base concerning neonicotinoid insecticides and insect pollinators produced by Prof Charles Godfrey et al is below.

<http://rspb.royalsocietypublishing.org/content/281/1786/20140558.full.pdf>

██████ (Defra official)