

WELSH GOVERNMENT CONSULTATION DOCUMENT: CONSULTATION ON THE DRAFT ACTION PLAN FOR POLLINATORS FOR WALES - RESPONSE BY NATURAL RESOURCES WALES

On 1 April, Natural Resources Wales (NRW) brought together the work of the Countryside Council for Wales, Environment Agency Wales and Forestry Commission Wales, as well as some functions of Welsh Government.

Our purpose is to ensure that the natural resources of Wales are sustainably maintained, used and enhanced, now and in the future.

We will work for the communities of Wales to protect people and their homes as much as possible from environmental incidents like flooding and pollution. We will provide opportunities for them to learn, use and benefit from Wales' natural resources.

We will work for Wales' economy and enable the sustainable use of natural resources to support jobs and enterprise. We will help businesses and developers to understand and consider environmental limits when they make important decisions.

We will work to maintain and improve the quality of the environment for everyone. We will work towards making the environment and natural resources more resilient to climate change and other pressures.

Natural Resources Wales (NRW) welcomes Welsh Government's leadership in developing the first pollinator action plan in the UK and its commitment to addressing declines in both wild and managed pollinator populations. The calls for "joined up policy and governance", "better and more connected habitats", achieving "favourable conservation status of protected areas" and an ecosystem approach to the issue are particularly welcome. The Action Plan provides a useful background to the main issues and to the impact of pollinator declines upon agricultural and biodiversity interests, and provides an agenda for action to help to alleviate the problems. However, these actions will not fully address the declines witnessed over the last three to five decades. A more ambitious approach to the management of farmland and the wider countryside is required to provide "better and more connected" flower-rich landscapes.

While the sympathetic management of urban habitats and the Welsh Government estate, including that managed by NRW, are very helpful, the provision of increased areas of flower-rich countryside is critical to any pronounced improvement in wild and, to some extent, managed pollinator status and distribution. The combination of dramatic historical losses of unimproved grassland (91%) and heathland (50-90%) and the fragmentation and isolation of surviving flower-rich habitats have had a major impact upon pollinators, with many once-widespread species either being lost to Wales or retreating to better-connected coastal landscapes which have survived agricultural improvement. In truth, the pastoral agricultural

landscape that dominates the Welsh countryside has little reliance upon healthy pollinator populations. Indeed, the Action Plan notes that “61% [of agricultural land use] is permanent pasture, potentially with few flowering species to support pollinators”. With a future focus on increased food production to feed increasing global populations, and in a changing climate, there may have to be a paradigm shift to arable crops or mixed farming with a concomitant need for pollinators. This should be a clarion call to act now to safeguard and enhance pollinator populations.

The Action Plan emphasises the importance of Glastir to the provisioning of flower-rich habitats with its “many pollinator friendly options”. However, the scheme currently operates on just 13% of agricultural land – too localized and untargeted to have much impact. Management options under Glastir Entry are rather generic and small-scale and the ending of specific management prescriptions for the shrill carder bee *Bombus sylvarum* and brown-banded carder bee *B. humilis* within their key distributional strongholds has weakened the efficacy of Glastir Advanced.

The exclusion of bumblebees from Glastir Advanced prescriptions creates another problem. While most pollinator species have relatively short flight periods as adults, bumblebees are actively seeking forage from March, (when queens emerge from hibernation to found a nest), to late September, when the next generation of queens are preparing for hibernation. Critically, this necessitates the availability of suitable forage for a seven month period.

NRW recommends a more ambitious programme of habitat restoration based on an ecosystem approach with more, bigger and better connected flower-rich habitats approximating to 10 to 15% of the landscape, and for extended periods to satisfy bumblebee requirements. Protected sites such as SSSI (12% of Wales in area) and SAC and the management of Welsh Government and NRW estate e.g. woodlands and National Nature Reserves would provide a major contribution towards this target, with Sites of Importance for Nature Conservation (SINC)/Wildlife Sites and NGO nature reserves also contributing. Glastir and other agricultural initiatives could provide the funding and encouragement to deliver outcomes from a farming and wider countryside perspective.

More detailed comments on Section 4 ‘An Agenda for Action’ and on the Action Plan generally are given below.

AN AGENDA FOR ACTION

Whilst the four Outcomes are supported, it is unlikely that the Actions in their current form will provide the desired results.

Action 1: Promoting diverse and connected flowering habitats across farmland

The main vehicle identified in the Action Plan for the delivery of better and more connected flower-rich farmland is Glastir. The current low percentage of agricultural land within the scheme and a lack of targeting reduce the impact the scheme will have upon pollinator recovery. Glastir Entry options are rather generic and small-scale, and Regional Packages do not include either shrill carder bee or brown-banded carder bee (although moss carder bee *Bombus muscorum* is listed for Carmarthenshire, Ceredigion, Pembrokeshire and Swansea; red-tailed carder bee [*B. ruderarius*?] is listed for Swansea). While they are included within the scoring system for Glastir Advanced, the ending of specific management prescriptions for shrill carder

bee and brown-banded carder bee considerably weakens the efficacy of the scheme. The original prescriptions included the sowing of red clover leys.

There is, in fact, a possibility that some Glastir management options will reduce the quality of habitats for pollinators, with 'low' inputs of nitrogen onto semi-improved grasslands resulting in a less diverse and flower-rich sward.

Ecosystem-scale demonstration projects such as the Cambrian Mountains Initiative, which have a ready-made partnership approach, a scientific evidence base and a commercial focus, could include a focus on honey bees as a way of drawing together the social, environmental and economic aspects of land management. The Cambrian Mountains Initiative also provided meadow and woodland scheme that proved popular with landowners and could be utilized as a model for addressing flower-rich grassland and pollinator declines.

Working with Farming Connect to promote the pollinator message is important but on-the-ground results will require (financial) incentives.

The reference to CAP reform as a vehicle to alleviate pollinator declines is welcomed.

Action 2: Promoting diverse and connected flowering habitats across the wider countryside

Amounting to 12% of the land area of Wales, protected sites (Natura 2000 and the SSSI network) can make a significant contribution towards alleviating pollinator declines and helping to provide better connected flower-rich habitats. Indeed, these sites are often the last retreat of many of our rare and scarce pollinator species. However, neither designation was designed with these aims in mind and many protected sites do not offer the exacting ecological requirements of key pollinator species. Critically, as suggested in the Action Plan, many sites are in unfavourable condition and require resources to secure more sympathetic management. There is also an urgent need to accelerate the notification programme of currently-unprotected flower-rich grasslands which continue to be lost through neglect or agricultural improvement.

Without more adequate resourcing, the BAP process and the currently incomplete SINC network are unlikely to be able to arrest the loss of flower-rich habitats and pollinator numbers.

Priority Habitat Maps are already freely available for most habitats, including flower-rich grasslands and heathlands. These identify key areas and the potential for restoration and better connectivity.

The involvement of NRW in the management for pollinators of the Welsh Government woodland estate is welcomed. Indeed, the former Forestry Commission Wales has already been working with Butterfly Conservation to secure more sympathetic management for woodland butterflies and moths. We will look at how we can widen this management for the broader pollinator interest, both within the woodland estate and more widely e.g. land managed by NRW for flood defence purposes may also be able to provide pollinator-friendly habitats, given sympathetic mowing regimes.

Action 3: Promoting diverse and connected flowering habitats in our towns, cities and developed areas

Such actions are welcomed as, arguably, it should be easier to provide flower-rich habitats for pollinators in urban areas rather than the countryside as there is direct control on the

management of parks, green spaces and, often, a receptive public audience. However, the suggestion that there may be a “low cost or no cost” may not be the case. Adjusting cutting and mowing regimes to leave areas uncut may prove to be more expensive than cutting all at once. Planting guidance should highlight the importance of native plant species and emphasise the potential problems associated with the planting of non-natives with their inherent invasive and disease-related issues e.g. *Phytophthora* fungi associated with ornamental shrubs.

Brownfield sites are often important refuges to pollinators in both urban and countryside situations as, depending upon substrate, seed source and management, they can support flower-rich swards. An assessment of the importance of individual sites to pollinators should be undertaken before such land is re-developed.

It would be useful to highlight the pollinator-friendly policies and actions already undertaken by Welsh Government on its own administrative estate as a guide to best practice.

Action 4: Supporting UK action to promote healthy populations of pollinators in Wales

While this action has a primary focus on honey bees, it should be noted that there is increasing use of managed bumblebee populations for commercial crop pollination, and increasing concern regarding genetic mixing with native strains and the concomitant risk of spreading diseases.

The short paragraph on use of pesticides should be expanded to refer to recent EU ban on selected neonicotinoids.

Action 5: Working to raise awareness of the importance of pollinators and engage our citizens in their management

Highlighting pollinator issues through the Ecoschools Initiative is laudable, as providing such information to future land managers is vital. The request for NRW to review the ‘plant for wildlife’ project is noted.

The engagement of farmers through Gwlad and Farming Connect is critical. The provision of sympathetically-managed flower-rich habitats in better-connected landscapes is essential to pollinator status and distribution.

Action 6: Linking together Welsh Government policies to produce beneficial actions that are good for pollinators and therefore wider ecosystem health

The decline of pollinator populations will not be addressed unless there is a partnership approach between Welsh and local government, conservation agencies and NGOs and the farming community. The initiative will be an acid test of the ecosystems approach.

Action 7: Building an evidence base to support future action for pollinators

There is certainly a need for more information on the status and trends of pollinator species and populations, and on their dependence upon key flower-rich habitats. This is probably best collected at a UK or European level rather than at a Wales level as such research and survey is likely to be costly.

The efficacy of any actions which emerge from this Action Plan will also need to be monitored and evaluated.

MINOR AMENDMENTS/CORRECTIONS ON THE ACTION PLAN TEXT

As a general point, the Action Plan would have greater clarity if wild and managed pollinator information and actions were consistently divided into separate sections. Currently there is too much room for confusion.

Evidence for Change

A more appropriate vision would be: “Wales ~~has the conditions to support~~ supports healthy populations of wild and managed pollinators to benefit, the people, economy and environment of Wales.”

Page 1. Introduction

It would be worth mentioning managed bumblebee populations for use in glass-houses for pollinating crops such as tomatoes.

Page 2. What Pollinators need

Some species, primarily bees, need pollen as well as nectar. Shelter is important not just for nesting e.g. butterflies and moths.

The text should read ‘common knapweed’ (*Centaurea nigra*) rather than ‘greater knapweed’. Other examples to include are common bird’s-foot-trefoil (*Lotus corniculatus*) and red clover (*Trifolium pratense*).

Page 5. Our vision for Pollinators in Wales – see above.

Page 7. The Natural Environment and Rural Communities Act

There are no hoverflies listed in Section 42.

Page 9. Wild pollinators

Explain why inland species have been lost.

Page 11. Agricultural intensification and the move towards monocultures

It would be helpful to provide a list of the pollinator friendly options in Glastir.

Page 11. Habitat alteration

Reword relevant sentence to “Honey producers can ~~rely on~~ be reliant upon heather at such time, and heather honey remains a very popular product”.

Explain why heathlands are in poor condition – refer to Article 17 results (2007 and 2012-13) and BAP reporting (2008).

Explain how woodland could provide better opportunities for pollinators.

Page 11. Disease

Refer to the various DEFRA/WG documents e.g. ‘Bee Health Evidence Plan (March 2013)’, ‘Healthy Bees. Protecting and improving the health of honey bees in England and Wales (March 2009)’, ‘Bee Disease and Pest Control (Wales) Order 2006’ and the BeeBase Healthy Bees Plan Newsletters (twelve to date, most recently in December 2012).

Reword “It is also becoming clear that many pests and pathogens can spread within and between populations of wild and managed **bumblebee** species” - see Murray et al. 2013 Biol. Cons. 159: 269-276. It would be worth adding that UK and Welsh Governments are considering how to restrict the importation and accidental release of non-UK bumblebee strains from Europe.

Highlight that the sentence on winter losses relates to honey bees only, if the Action Plan continues to amalgamate managed and wild pollinator information.

Page 12. Agro-chemicals

Needs to refer to the recent 2 year EU ban on certain neonicotinoids.

In respect of the sentence "...weeds are effectively controlled" – Note that weeds are often the forage of pollinators!

Page 12. Climate change

Warm, dry summers will be good for many pollinators; wet summers will be a real challenge.

Is there a reference for the divergence of blackcurrant and its pollinators?

Note the 7-month flight period of bumblebees, making them very susceptible to climate and many other factors.

Page 13. Managed pollinators

Include relevant references to NBU and the healthy Bees Plan (see above).

Page 14. Research and Initiatives

Include web links to STEP and IPI. The document should refer to funding sources – EU and DEFRA respectively.

Provide better examples than the three provided e.g. shrill carder bee surveys by CCW, the work of Bumblebee Conservation Trust on shrill carder bee and publicity, and perhaps Tir Gofal and Glastir.

Page 15. Outcome: Wales provides diverse and connected flowering habitats to support pollinators

It is very unlikely that management of habitats for pollinators would have a detrimental impact upon "other important habitats".

Change "unmanaged" to "managed" in line 1.

Page 16. Area for Action 1

List Glastir options.

Fuller explanation of the benefits of CAP reform is required.

Re: training for Glastir project officers – note that Bumblebee training has been postponed over the last two years.

Reword "addition of clover as a nectar source, to grass leys" to "addition of red clover as a pollen and nectar source to grass leys".

We recommend re-instatement of targeted management options for bumblebees in Glastir Advanced.

Page 16. Area for Action 2

The Natura 2000 statistic of 700,000 ha includes large areas of marine and intertidal habitats. More appropriate statistics are:

SSSIs (excluding inter-tidal) = 219,303 ha (approx. 12% of Wales).
N2K sites (excluding marine & inter-tidal) = 147,780 ha (67% of the SSSI total).

Protected sites are not primarily managed for pollinators, and most never will be. Remove reference to marsh fritillary – it is not a critical pollinator.

Priority habitat mapping has already been completed under the auspices of the Wales Biodiversity Partnership.

Page 17. Area for Action 3

Reword “Many choices for pollinators” to “Many of the ecological requirements of pollinators”.

Provide details of current WG “pollinator friendly policies across our administrative estate”.

Provide detail of TAN 5 policy and guidance in relation to pollinators.

Page 18. Area for Action 4

Reword “We will monitor the situation with regard to the introduction of non-native bees for commercial pollination purposes” to “We will monitor the situation with regard to the introduction of non-native bumblebees for commercial pollination purposes, and the concomitant risk of spreading diseases”.

Not sure what is meant by “consider any new evidence bans introduced”.

Page 19. Area for Action 7

Evidence is best collected at a UK or European level.

Page 20. Area for Action 7

Few critical pollinators are included in the Habitats Directive or in Section 42.

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