

# **Full Responses to the Consultation on the Draft Action Plan for Pollinators**

**August 2013**

Responses 61 – 83

**From:** Communications [mailto:communications@wales.gsi.gov.uk]  
**Sent:** 04 June 2013 13:57  
**To:** BioDiversity  
**Subject:** Draft action plan for pollinators - online form response

Page used to send this email: /consultations/forms/pollinators-action-plan-response-form/

Name: Mr Anthony Griffith

Email / telephone number: griffith652@btinternet.

Your address: 10 Pentefelin Holyhead Anglesey

Question 1: Do you agree with our vision for pollinators in Wales?: No not with all. I have been keeping bees on farmers land and they give me plenty of warning when they are spraying chemicals.

Question 2: Have we identified the main areas of concern for pollinators in Wales or are there further issues you want to identify?: No one of my main concerns is the poisonous plant ragwort which is rife in my area. The honey which my bees produce from this pollen is inedible and hinders their wintering. My other concern is badgers which have killed of many bee hives and has prevented me from keeping my bees in certain areas.

Question 3: Do you agree with the outcomes identified, and the areas for action to achieve them? Your comments are welcomed.: No not with all.

Question 4: How could you contribute further to the areas for action identified? How could we support you to do so?: Local authorities and land owners should be made to destroy the ragwort on their land.

Question 5: Would you like to be involved in developing the actions needed to achieve the outcomes? If so, in what way?: I would like to be informed on any further developments.

**From:** Communications [mailto:communications@wales.gsi.gov.uk]  
**Sent:** 04 June 2013 14:37  
**To:** BioDiversity  
**Subject:** Draft action plan for pollinators - online form response

Page used to send this email: /consultations/forms/pollinators-action-plan-response-form/

Name: David Purdon

Organisation (if applicable): voluntary roles with several wildlife / environment organisations in Wales

Email / telephone number: dwp\_taicanol@hotmail.com

Your address: Tai Canol Dolybont Borth Ceredigion SY24 5LZ

Question 1: Do you agree with our vision for pollinators in Wales?: YES

Question 2: Have we identified the main areas of concern for pollinators in Wales or are there further issues you want to identify?: I think you have placed too much emphasis on honeybees and too little on the other pollinator species.

Question 3: Do you agree with the outcomes identified, and the areas for action to achieve them? Your comments are welcomed.: I agree with the outcomes identified, but wish they went further.

Question 4: How could you contribute further to the areas for action identified? How could we support you to do so?: The public should have some method of reporting damaging activities.

Question 5: Would you like to be involved in developing the actions needed to achieve the outcomes? If so, in what way?: Essentially yes, but my individual resources are tiny compared to the size of the task at hand.

Question 6: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them: There are many damaging activities in the countryside that individuals are powerless to influence. County Councils mow roadside verges unnecessarily and farmers flail hedges unnecessarily. Councils remove mowings from verges all to seldom, this encourages a greater growth of rank grasses next year, and decreases the floristic diversity. Councils apparently receive more complaints about roadside verges not being cut than they do about them being overcut, and are not sympathetic to the

botanical interest. Every County Council should be required to develop a strategy for increasing the floristic diversity and abundance of the roadside flora useful to the maintenance of pollinators. They should be required to engage with the County Botanical Recorders and local Wildlife / Natural History Groups to assist with the formation of this policy. Councils have to cut back hedges for safety reasons, but this activity should be minimised, especially during the flowering season. Councils plant out, into parks and decorative beds, very large numbers of plants that are not bee friendly. They should be required to plant out species / varieties that are of use in maintaining our wild bee populations. Plants that attract bumblebees into our parks will not be a hazard to anyone. Welsh Government should appoint a Bee Tsar ( there is a bizarre idea ! ) to look at the development of these policies.

**From:** Communications [mailto:communications@wales.gsi.gov.uk]

**Sent:** 04 June 2013 15:32

**To:** BioDiversity

**Subject:** Draft action plan for pollinators - online form response

Page used to  
send this email: /consultations/forms/pollinators-action-plan-response-form/

Name: Geraint Jones

Organisation (if applicable): on behalf of National Parks Wales (Welsh Association of National Park Authorities)

Email /  
telephone number: geraintj@pembrokeshirecoast.org.uk

Your address: Pembrokeshire Coast National Park Centre, Bank Cottages, Long street, Newport, Pembrokeshire SA42 0TN

Question 1: Do you agree with our vision for pollinators in Wales?: The Welsh Government is to be commended for its commitment to addressing the issues surrounding the decline in pollinator populations. It is generally recognised that pollinator health is a critical issue globally. Moreover, this matter needs to be addressed as an important part of securing the future of the remaining semi natural resource in Wales and developing opportunities to increase biodiversity thereby creating a stronger, more resilient environment.

Question 2: Have we identified the main areas of concern for pollinators in Wales or are there further Welsh Government has undoubtedly noted the key concerns. However, that list in itself has no real meaning. Clearly identified links between those concerns and a firm programme of coordinated actions required to address them need to be made. That action programme needs to be ambitious and targetted at a landscape scale. This cannot be achieved through the current designations and agri-environment initiatives that have singularly failed to tackle the issues of habitat fragmentation and isolation that have increased in recent

issues you want to identify?:

Question 3: Do you agree with the outcomes identified, and the areas for action to achieve them? Your comments are welcomed.:

Action 1 We are concerned that Glastir alone is not going to contribute enough land area to improve pollinator health. Whilst a number of the Glastir prescriptions could be beneficial, scheme take up even into the medium term is going to be insufficient to make a meaningful impact. Welsh Government therefore needs to acknowledge that action must be wider than Glastir. Radical initiatives should be investigated. If 15% of every farm were to have flower rich cover either through field margins (sown), flower rich hay meadows (red and white clover, knapweed, yellow rattle, birdsfoot trefoil etc) flowering clover crops (silage crops rarely flower), uncut flower rich hedgerows (bramble, blackthorn, hawthorn, rose, foxglove etc), woodland edge (bramble, ivy, honeysuckle etc), woodland (bluebell, bramble, honeysuckle, sweet woodruff etc) and heath (heather, heath bedstraw and gorse etc) we would begin to make a difference. Another issue that needs addressing is the need to monitor the extent of actual flowering habitat, as grazing and mowing at inappropriate times can render even appropriate habitat ineffective. Agricultural intensification needs to be spelled out • Loss of flower rich meadows (target for improvement) • Loss of flower rich hedgerows (target improvement) • Field margins or rather lack of (target improvement) • Loss of bramble through sheep grazing rather than cattle grazing in rough pasture • Land down to silage (no flowering even of clover) • Loss of longer flowering hay crops There should also be a clear focus on early and late flowering crops that help pollinators in early spring and also to assist them to stock up for winter in the autumn, blackthorn as well as willow, crab apple and in autumn, ivy, gorse and bramble and unmown flower areas – leaving areas unmown is really important for autumn nectar as are heathland areas. Action 2 It is good that wider sites are acknowledged. Targeted payments as with National Park Authority management agreements are useful in this respect. Action 3 Towns and Cities are also important and it would be interesting to know how beekeepers are split between town and country. Action 4 Bee health is an interesting aspect as through Varroa we have lost a huge wild honey bee population, and this is probably impossible to address. We must be ever vigilant to importing disease to protect our other wild pollinators, because we rely on these more than we realise. The beekeeping industry is nowhere near big enough to account for most pollination services, and we must consider pollination beyond our commercial crops as we rely on this for so much more. Action 5 Raising awareness is a key aspect. Some activity is already underway. Whilst effective communication with the agricultural community is a major priority, this must also be done at the broadest level, beyond the immediate industry if we are to reverse the serious decline in pollinators. A small example is the Pembrokeshire Coast National Park Authority becoming involved with the Flutter and Buzz project where the promotion of wildflower gardens for schools and at Bluestone was

encouraged. Action 6 The message that what is good for pollinators is good for the wider environment (and humanity) is a critical action. Integration, coordination and joint delivery are essential. Action 7 We need to have a better understanding of the health of our environment. Hedgerows, heathland and lowland grassland for example have a very significant role to play in pollinator health. However, a clearer understanding of their current significance related to historic data would provide invaluable assistance in targeting resources. It is recognised though that gaining this information will require additional resources. Investigating the opportunities to promote alternative crops that directly benefit pollinators eg sweet woodruff which is understood to give honey similar in properties to Manuka Honey could be beneficial. We need also to better understand what other habitat requirements there are beyond their food. Uprturned tree roots provide nest sites for many wild bees, as do our hedgebanks, though these can be too overgrown. Veteran trees provide many nest sites and certainly wild honey bee populations thrived in tree hollows (and chimneys). The predator burden, encouraging birds through feeding can encourage pollinator predation, as can feeding badgers and raising both urban and country badger populations.

Question 4:  
How could you  
contribute  
further to the  
areas for action  
identified? How  
could we  
support you to  
do so?:

The Welsh National Park Authorities (NPAs) have been identified as test beds for innovative land management and are ideally placed to assist with the implementation of a Pollinator Action Plan. Each NPA has been involved in the development and implementation of conservation land management initiatives that have complemented national agri-environment schemes. They each have a comprehensive 'on the ground' network of conservation land managers with strong links into the local community. Critically, in this case they have a proven track record of partnership working in the delivery of conservation land management schemes. For example, the Bumblebee Conservation Trust has worked with the Ministry of Defence, Pembrokeshire Coast National Park Authority and the Countryside Council for Wales on a project to enhance a wildflower habitat on the Castlemartin Range. The project is to support, and hopefully expand, the habitat for one of the few remaining populations of the shrill carder bee (<http://www.pembrokeshirecoast.org.uk/default.asp?PID=450>).

Question 5:  
Would you like  
to be involved  
in developing  
the actions  
needed to  
achieve the  
outcomes? If so,  
in what way?:

The Welsh National Park Authorities very much wish to play their full part in developing the pollinator initiative bringing to bear land management and educational expertise.

Question 6: We  
have asked a

One area that has not had sufficient attention from our perspective is the role the public estate could play in any pollinator action plan.

number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Publicly owned or managed land is potentially a very significant resource. For example, it is understood that MOD owns 20100 ha in Wales (we have already described above one very positive pollinator support action that it is carrying out as landowner in Castlemartin), NHS Wales has 700ha and the former FC Wales 125524ha. Pro-pollinator management of these and all publically owned areas - especially sympathetic mowing regimes with an end to indiscriminate "trimmer madness" from April to September could yield significant gains for pollinators. These changes could be achieved sensitively without resulting in publically perceived abandonment of formally managed grounds. The Caring For Gods Acre project has shown how sensitive management of cemeteries and church grounds can have a significantly beneficial impact on nature conservation. Additionally, local authorities in Wales have improved their highways mowing regimes in recent years. However, not withstanding highways safety requirements, the development of the Pollinator Action Plan could provide an opportunity to further enhance highways management from a nature conservation perspective

**From:** Geraint Jones [mailto:GeraintJ@pembrokeshirecoast.org.uk]

**Sent:** 04 June 2013 15:45

**To:** BioDiversity

**Subject:** Supplementary Comments to the National Parks Wales response to the Pollinators Consultation

From Dr. Bradley Welch of Brecon Beacons National Park Authority.

Brecon Beacons National Park Authority welcome the opportunity to comment on such a timely and critical topic. We recognise the severity of the decline in pollinator abundance and richness across the United Kingdom, and, indeed, the world. We comprehend the potential implications of what this decline may mean for humans by way of a loss of various ecosystem services. More importantly, though, we highlight that the continued loss of both richness and abundance of pollinator species will lead to a series of cascading collapses of ecosystems across the globe, with significant impacts affecting agricultural systems as well as natural and semi-natural ecosystems. Wild and managed pollinators comprise a guild of keystone species supporting important structures and functions vital to the survival of many other species, including ourselves.

With these thoughts in mind, we offer the following comments related to the Draft Action Plan for Pollinators for Wales:

- We commend the Welsh Government for taking a big first step forward ahead of many other countries in the world. Having said that, we note that pollinators do not recognise political boundaries. For any efforts to be successful in Great Britain, they will require a coordinated effort amongst all member states. What affects pollinators in one part of Britain will certainly affect pollinators in other parts of the same land

mass. Indeed Issues such as invasive species, pests and diseases have an even longer reach across continents. Nevertheless, Wales is a great place to start!

- We call your attention to a raft of scientific papers which have been published in the last few years related to this topic which may help in creating targeted actions and monitoring objectives (see later comments on these topics). In particular, the 29 March 2013 issue of *Science* published several reports and papers about pollinator research.
- The vision. Wales needs more than the “conditions to support healthy populations of wild and managed pollinators...” Wales needs the pollinators as well. Please remember that both species and abundance of pollinators has declined significantly. Hence, there needs to be an active programme to reinstate pollinator species into habitats where they have disappeared (increase extent and local richness) and encourage an increase in numbers. Maintaining or improving conditions will only be of help if the organisms are in close enough proximity to benefit from habitat improvements. They will not benefit if they do not exist in the area or do not exist at all. This is alluded to on page 15 where you recognise that we should be ensuring there are healthy populations of pollinators.
- We recommend changing the vision to read “Wales has rich and abundant populations of wild (native) and managed pollinators and the conditions to support healthy populations to benefit the people, economy and environment of Wales long term.”
- We welcome the summarised evidence base and statement of current conditions.
- We recommend including invasive species on the list of main threats to pollinators. This includes direct threats from species such as the Asian hornet (*Vespa velutina*), threats from poisoning by certain species of lime (*Tilia suborbicularis*) or displacement of native forage by non-native plants (e.g., Himalayan balsam) which alters long-established plant –pollinator relationships.
- Again, thank you very much for invoking the three key principles of a precautionary principle, early intervention and avoiding risk of negative economic impacts.
- We welcome the emphasis placed on the linkage between pollinators and the ecosystem approach highlighted in Box 1, page 8. Reading it, though, leaves the reader with the impression that pollinators are very beneficial to have around since they provide a “service” to humans, but their services are non-essential; we do without them if we chose to do so. (This is an inherent danger of the ecosystem services approach which tries to put a monetary value on fundamental ecological functions. The ecosystem approach is an important communication tool, but it needs to be used carefully.) Please note that these are vital functions that pollinators perform.
- It is important to note in the discussion of wild versus managed pollinators that wild pollinators are most hard-hit by declines in the numbers of species affected as well as a decline in populations of each species. The loss of wild pollinators is of grave concern as recent



studies show that wild pollinators pollinate crops more effectively than managed bees and result in increased fruit set. Honey bees merely supplement pollination by wild pollinators. This is true across the globe. (Lucas A. Garibaldi<sup>1,\*</sup>, et al. 2013. Wild Pollinators Enhance Fruit Set of Crops Regardless of Honey Bee Abundance. *Science*:

Vol. 339 no. 6127 pp. 1608-1611.)

- The discussion of main concerns addresses what is occurring but not why it is occurring. It would be good to have more evidence from the literature here which points to the ultimate causes and mechanisms. This would in turn assist in developing very specific, targeted actions.
- Pollution should be included in the main concerns section as well. Studies show, for example, that since the 1800s air pollution has reduced the distance that insects can detect the scent trails that plants use to attract pollinators by 75%. This was noted by Pam Gregory in a recent article in *Beecraft* magazine (April 2013, referencing Fuentes, JD. 2008. Flowers' fragrance diminished by air pollution. *Atmospheric Environment*.)
- We would like to strongly emphasise your statement on page 13 that there is no central focus point in Wales for work and information on all pollinators. While significant coordination and work is established for managed pollinators, it is lacking for wild pollinators. Given research findings such as those listed above, it appears that we might have things backwards. Unfortunately, this is likely due to economic considerations given to managed pollinators that wild pollinators are not blessed with.
- The last paragraph on page 15 suggests that together we will provide habitats for pollinators but not at the expense of other important habitats. This statement seems odd after making a strong argument earlier in the document as to why pollinators are essential to our existence. What are these other important habitats? Where do they exist? Are they not home to pollinators as well? Further explanation is needed here.
- Area for action 1 on page 16; Change the word "promote" in the title and replace with "create" or "enhance". We need to actually do the work not just promote it. This shouldn't be optional given the stated importance of the issue.
- Noting the above comment, the actions throughout need clear and obvious targets. How much habitat creation or enhancement is the target? Where should we target it? How can it be built into Glastir? Without clear targets, it is likely that nothing of substance will come of these actions. They are still too aspirational.
- If only 13% of agricultural areas are signed up to Glastir, how much of a difference will small amounts of enhancement work on participating farms and commons make?
- Again under Area for Action 1 please note that beekeeping plays a minor role in crop pollination, so efforts should be concentrated on encouraging wild pollinators to utilise agricultural as well as other ecosystems.
- We welcome the action under Area of Action 2 related to mapping and identification for the reasons noted in comments above. Again "promoting" needs to be changed in this and other headings as promotion will not lead to results.

- We welcome the opportunity to extend our role as a national park to assist with pollinator conservation efforts. These efforts fit very nicely into the remit of our first purpose and reinforce the second purpose with delivery mechanisms being realised by way of the statutory duty. We would request that the actions be developed with specific, realistic targets.
- We also welcome the policy-related actions listed under Area for Action 3, but again emphasise that more needs to be done than supporting and promoting.
- We welcome the outcome that Wales' pollinator populations are healthy. Please build this into the overall vision.
- Area for action 4 needs to include further discussion about a pollinator agency or unit and not just a bee unit. As noted elsewhere, wild pollinators need to have more emphasis and activities related to all pollinators need to be coordinated.
- With that in mind, monitoring should include non-native pests that pose known or potential risks to pollinators (beyond non-native bees).
- We highlight the need for ongoing monitoring of pollinator populations, the threats to pollinators and the actions developed in the final version of this plan. Monitoring is the key to success but is very rarely implemented (as noted on page 19 penultimate paragraph.)
- "Although bees..." on page 18 should be changed to "Although pollinators..."
- On page 19 we need to have a biodiversity strategy that protects and conserves pollinators and not just recognises them.
- Whether the remit of these actions falls to national parks, local authorities, local bee keeping associations and/or Natural Resources Wales, the appropriate organisations will require several items to be clear. They will need a clear understanding of the actions to be delivered and the outcomes to be achieved (and hence the actions in this draft will need to be refined). They will need to understand where the priorities for pollinators rank amongst the long list of other conservation priorities they are all being asked to deliver. They will need an understanding of how these priorities can be delivered most effectively in combination with other directives, priorities and guidance, i.e. Welsh Government policies must be streamlined and conflicts removed as noted in *Sustaining a Living Wales*. Just as importantly the actions and priorities within the action plan need to be properly resourced with people, time and money. There is no sense setting the priorities if there are no resources to deliver them.
- One helpful suggestion might be to use the existing managed pollinator network to deliver wild pollinator benefits. Local beekeeping associations could be trained up to deliver wild pollinator habitat enhancement modules as part of their teaching curriculum for both beginner and advanced courses. Beekeeping courses geared toward advanced level certificates could require that all students have a basic understanding of wild pollinator identification, habitat and species conservation, etc. Trained volunteers could then be used to monitor local populations of both managed and wild pollinators in much the same way as regional bee inspectors are used to check the health of managed honey bee colonies locally.

Overall, we feel that the action plan is headed in a positive direction. The framework is there, but it needs a bit of detail.

Thank you for providing us with an opportunity to comment.

**From:** Communications [mailto:communications@wales.gsi.gov.uk]  
**Sent:** 04 June 2013 17:02  
**To:** BioDiversity  
**Subject:** Draft action plan for pollinators - online form response

Page used to  
send this /consultations/forms/pollinators-action-plan-response-form/  
email:

Name: Bleddyn Lake

Organisation  
(if Friends of the Earth Cymru  
applicable):

Email /  
telephone bleddyn.lake@foe.co.uk  
number:

Your  
address: 33 Castle Arcade Balcony, Cardiff, CF10 1BY

Friends of the Earth Cymru is very happy to support the Action Plan for Pollinators in Wales, and is pleased that the Welsh Government has responded so positively to the main demand of Friends of the Earth's 'The Bee Cause' campaign. We are delighted to see such a variety of

Question 1: issues being covered in this draft consultation and welcome the fact that  
Do you agree we were given the opportunity to be a part of the stakeholder group  
with our which was set up to inform the basis of this consultation. We would  
vision for also like to see active support for healthy populations of managed and  
pollinators in wild bees and other pollinators, to complement the proposed initiatives  
Wales?: to support those in decline. In order to be able to measure the success of

any of these initiatives it is vital that we have accurate baseline data for pollinators in Wales - species, diversity, habitat, numbers etc.

Establishing these should be one of the initial priorities of the Welsh Government and other partners.

Question 2:

Have we

identified the We agree with the 5 main areas of concern for both managed and wild  
main areas of pollinators (listed below). These mirror the main drivers of bee decline  
concern for which were identified in comprehensive research in England carried  
pollinators in about by the University of Reading for Friends of the Earth in 2012  
Wales or are www.foe.co.uk/beesreport • Agricultural intensification and the move  
there further towards monocultures • Habitat alteration – destruction or  
issues you fragmentation • Disease • Agro-chemicals • Climate change  
want to  
identify?:

Question 3: We welcome the fact that Welsh Government has identified its own

Do you agree with the outcomes identified, and the areas for action to achieve them? Your comments are welcomed.:

responsibility to help pollinators and help other stakeholders to do so and committed to taking Government action. We have indicated below some more ideas we have for further or strengthened action. Area for Action 1: Promoting diverse and connected flowering habitats across farmland We welcome the proposal to encourage farmers to incorporate clover in pasture – this could usefully be extended to other plant species beneficial to wild pollinators. We also welcome the commitment to use the Farming Connect service to including pollinator related key messages and guidance. This will be crucial to take up of beneficial measures. Experience in England for example has shown poor take up of the most beneficial agri-environment options for pollinators (less than 0.1% of the area managed under Entry level Stewardship - ELS) showing that outreach to farmers is as important as making the options available. Buglife's 'B-lines' project which involved talking to farmers about the benefits of boosting pollinator populations seems to have had success in increasing farmer willingness to plant wildflower margins. As noted in the plan arable crops in Wales cover a small area of Wales but in those areas encouraging diversification of crops (possibly under Greening of Pillar 1 of CAP) and through Farming Connect would help to increase forage for bees. We would like to see a commitment to helping farmers to reduce herbicide use (which removes sources of forage when crops are not in flower) – whilst pesticide approvals remain beyond the powers of the Welsh Government the Farming Connect service could provide a positive way of working with farmers to reduce chemical dependence. Related to this point, we would like to see the Welsh Government press the UK Government to devolve the regulation of pesticides and biocides to the Welsh Government. Fertiliser use also reduces flowering plants so again the Welsh Government could carry out research/trials into maintaining healthy pastures with reduced use of fertilisers (which should be helped by introduction of clover) and give advice to farmers. We recommend the Welsh Government work with livestock farmers to develop best practice in grazing management for pollinators. The management of pasture is as important as planting the right crops. Area for Action 2: Promoting diverse and connected flowering habitats across the wider countryside We welcome the suggestion that important areas of habitat are identified and designated to afford them better protection. It would be desirable to see a definite commitment to this from Welsh Government /NRW. Habitats that lie outside of protected areas can be crucial for pollinators and also provide the connectivity between habitats needed for species to move between areas. We would like to see NRW and other relevant forestry organisations in Wales investigate ways in which forestry can be better utilised for pollinators by providing more shelter and forage opportunities. Surplus wood for instance could be donated to local community groups and social enterprises to make bee/bug hotels thereby benefitting local communities. We would also like to see other large land owners in Wales (businesses, organisations, charities, stately homes, parks, golf courses, the MOD etc) being encouraged to provide pollinator friendly forage and habitats on their land and to reduce and minimise the

amount of pesticides and herbicides they use. Area for Action 3: Promoting diverse and connected flowering habitats in our towns, cities and developed areas We welcome the suggested actions. We would like to see more detail of how other stakeholders such as local authorities will be supported and encouraged to provide better habitats in urban areas e.g. guidance on phasing out chemical use in parks, guidance on best regimes for encouraging pollinators in parks, information on potential cost savings of changing mowing regimes would all be valuable. Some Local Authorities for instance are already doing very good work on these issues and their knowledge can be used to help inform guidance and develop a 'good practice guide'. We would like to see a new Charter or official Standard developed for Local Authorities and other Public Authorities in Wales which would have a set of specific criteria that they would have to meet to be awarded a standard of excellence for pollinators, similar to the Fair Trade Town status which is achieved by meeting certain criteria. The Bee Guardian Foundation (<http://www.beeguardianfoundation.org/bee-guardian-status.html>) has drawn up a series of criteria for cities to achieve to become classed as a Bee Guardian City – these criteria could be used as a basis of a new Welsh national designation incorporating (for example) public land management, pesticide use, mowing regimes, public procurement of local honey for example, parks management, protection of existing and designation of new vital pollinator habitats, and maybe the number of schools/organisations/local businesses taking part in pollinator friendly planting. Note on phasing out pesticides in parks: Exemptions could be put in place to control particular incidents of pest or disease. But, as urban areas are increasingly important for bees, measures should be taken to ensure harmful products are not used unnecessarily. Cities such as Toronto and Paris have managed to go pesticide free or significantly reduce the use of pesticides. In the UK Eastbourne Borough Council recently committed to reducing pesticide use in its parks and gardens.

<http://www.eastbourne.gov.uk/leisure/parks/conservation/bees/> - The Welsh Government should draw and support on this experience We welcome the statement: "Planning Policy and Guidance is already in place to support work for pollinators in new developments through TAN 5. We will consider including pollinator friendly practice when reviewing sustainable housing policy guidance for planning" Local Authorities need to be given clear guidance that they can insist on new space for biodiversity as well as protecting what is there. We would like to see this as part of the definition of sustainable housing. There is a lot of evidence that access to green space is beneficial to people's health and wellbeing therefore this relates to quality of life and benefit to communities as well as for wildlife. The Town and Country Planning Association (TCPA) for instance has issued good practice guidance on green infrastructure and biodiversity.

<http://www.tcpa.org.uk/pages/planning-for-a-healthy-environment-good-practice-for-green-infrastructure-and-biodiversity.html> We believe there should be more co-ordinated support given for initiatives such as community orchards which benefit not only pollinators but also

help address issues of growing food locally, healthy eating and bringing communities together. Area for Action 4: Supporting UK action to promote healthy populations of pollinators in Wales The draft plan states that “Because of the relatively small areas of arable land where these pesticides are used in Wales, we may need to concentrate efforts on raising awareness of the effects on pollinators of the use of pesticides in urban areas” We believe this Plan should go beyond ‘raising awareness’ and aim for phasing out pesticide use with the Welsh Government giving strong guidance and leadership on this. The draft plan also states that “It is the policy of the Welsh Government to reduce to the lowest possible level the effect of pesticide use on people, wildlife, plants and the environment while making sure that pests, diseases and weeds are effectively controlled”. Until the Welsh Government has control of pesticide regulations in Wales we believe that the Welsh Government could commit to reduce pesticide use, reduce unnecessary pesticide use or reduce the impact of pesticides on pollinators. Wales would be leading the way in the UK if this was included. Even though the arable area in Wales is relatively small, this plan could include developing good Integrated Pest Management (IPM) protocols for crops aimed at minimising pesticide use – again leading the way in the UK. Area for Action 5: Working to raise awareness of the importance of pollinators and engage our citizens in their management We recommend that the original stakeholder group is retained (and expanded) to ensure all stakeholders are engaged on an ongoing basis to ensure the successful achievement of the vision. We would like to see an annual Pollinator Day be instituted and run in Wales with the help of partners to act as an ongoing focal point for public awareness and engagement with the issues. It could become a national celebration day of all pollinators and serve as a way to highlight the good work being done all around Wales. Community groups, schools and others could use the occasion to run fun and colourful events helping to engage others in their communities. We would like to see closer co-operation with garden centres, plant nurseries and other relevant retailers in Wales to expand the use of the current RHS ‘Perfect for Pollinators’ scheme of plant identification to provide the public with a more informed choice of which plants and seeds they can buy to make their gardens pollinator friendly. We would like to see all schools in Wales be given the opportunity to become involved in this issue through the provision of bilingual educational packs (either new or based on existing packs such as Friends of the Earth’s Bee Education Pack

[http://www.foe.co.uk/what\\_we\\_do/bee\\_cause\\_educators\\_35049.html](http://www.foe.co.uk/what_we_do/bee_cause_educators_35049.html)). In collaboration with partners, schools can be provided or given access to wildflower seeds, fruit trees and bushes and other pollinator friendly plants to create pollinator areas within their school grounds (if suitable). It can also be incorporated into the existing Eco Schools initiative. We would like to see the Welsh Government and other partners work with Visit Wales to investigate the possibilities of using the various new pollinator projects and initiatives (wildflower habitats, bug hotels, local honey producers etc) to create a tourist trail or similar that would help

support our tourist industry in Wales and help to highlight the good work that is going on all over Wales and make it a real ‘selling point’ for ‘green tourism’ in Wales. Area for Action 6: Linking together Welsh Government policies to produce beneficial actions that are good for pollinators and therefore wider ecosystem health We agree that an integrated approach to policy and delivery is essential in order to ensure that actions are beneficial for pollinators. A few examples of this from within the Welsh Government’s current legislative programme are the Sustainable Development Bill and the Planning Bill. The Sustainable Development Bill will have an impact on all public authorities in Wales, making sustainable development the central organising principle of their operations. The definition of sustainable development in that legislation, along with a substantive duty on public authorities to act in accordance with this, will have a long term impact on decisions relating to pollinators in Wales across government and the public sector. In order to produce a beneficial impact and consider the sustainability of pollinators, the definition must include the principles of living within environmental limits, using natural resources prudently, and protecting Wales’ natural environment. The Planning Bill and supplementary planning guidance such as Planning Policy Wales and the TANs will have a significant impact on how land is used in Wales, what conditions are made in relation to developments and what is taken into account when making decision around land use. Ensuring pollinator-friendly land and corridors in rural and urban areas of Wales is essential for the health and protection of pollinators, and the planning reforms are a crucial opportunity for the Welsh Government to integrate an ecosystems approach across land use planning. We would suggest that Natural Resources Wales would be best place to ensure that Welsh Government policies, and those of the UK government and local government, that can have an impact on ecosystems are linked up for the benefit of pollinators, and do not have unintended consequences.

Question 4:  
How could  
you  
contribute  
further to the  
areas for  
action  
identified?  
How could  
we support  
you to do  
so?:

Friends of the Earth Cymru would like the opportunity to be involved in any stakeholder group.

Question 5:  
Would you  
like to be  
involved in  
developing  
the actions

Friends of the Earth Cymru would like the opportunity to work with others to help shape a Local Authority Pollinator Award Scheme. We also have a great deal of experience in community engagement work so could offer help with planning community schemes and any Wales-wide annual Pollinator Day.

needed to achieve the outcomes? If so, in what way?:

Question 6: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

It is absolutely right that the plan aims to help all bee species and other pollinators. However given that Wales is home to Britain's rarest solitary bee – the Large Mason Bee (*Osmia xanthomelana*) and that this species is in danger of extinction we would also like to see some targeted measures in the plan for this bee. The Large Mason Bee is so rare that it is now only recorded at two sites in north Wales. Loss of nesting and forage habitat have been the main causes of decline for this bee. Research by the University of Reading for Friends of the Earth looked at what could be done to help this bee, praising existing efforts by Gwynedd County Council and acknowledging the potential role of the draft pollinator plan to help restore habitat and setting out further specific recommendations.

[http://www.foe.co.uk/resource/briefings/bees\\_wales.pdf](http://www.foe.co.uk/resource/briefings/bees_wales.pdf) If suitable, we would like to see the Wales for Africa programme run some trial projects with communities in Africa using bee keeping and honey production to aid community development. Organisations such as IBRA and Bees for Development are already active in these areas so their knowledge could be used to help develop these projects.

### **Consultation on the Draft Action Plan for Pollinators for Wales** **CLA Cymru Wales Response**

**Organisation:** Country Land & Business Association (CLA)

**Address:** Unit 8  
Broadaxe Business Park  
PRESTEIGNE  
Powys  
LD8 2LA

**Question 1:** Do you agree with our vision for pollinators in Wales?

*The CLA broadly agrees with the vision of the Draft Action Plan; pollinators are an extremely vital element in our environment, with a complex relationship with both the features on which they rely and with those who rely upon them.*

*We hope that the Action Plan acts as a catalyst for further research in a field which still holds a huge number of unknowns, where comprehensive understanding is essential to ensure positive action is put in place, rather than quick decisions with detrimental effects.*

**Question 2:** Have we identified the main areas of concern for pollinators in Wales or are there further issues you want to identify? and **Question 3:** Do you agree with the



outcomes identified, and the areas for action to achieve them? Your comments are welcomed.

*We believe that the main areas of concern have been identified; however we would like to see a broader agenda for action. The Draft cites changes in semi-natural habitat, the introduction of pathogens, inappropriate use of agrochemicals and climate change as being the main factors contributing to pollinator decline. However, the emphasis for action has been placed on better and more connected habitats, due to feedback from stakeholders. This is the Lawton approach of more, bigger, better and joined, which is not a new concept and has been the recent policy driver for both biodiversity action plans and environmental schemes. Habitat condition is an obvious factor and we agree that farmers and landowners have a crucial role to play in improving the health of pollinator populations, however, we would like to see this draft action plan a) address the issues surrounding how landowners can contribute, b) address the science behind the outcomes and c) exploring further areas.*

*a) How landowners can contribute*

*20% of the UK cropped area comprises pollinator dependent crops and we know that the honey bee is the most common pollinator in Wales, but has shown a decline of 23% between 1985 and 2005.*

*We also understand, as the Draft states that, 'pollinators need semi-natural habitats such as wildflower meadows, hedgerows, woodland edges and agricultural landscapes which include unimproved grassland, hay meadows, clover rich grassland, orchards and arable crops' for both nectar sources and nesting sites.*

*The Draft does not however address the reasons behind why landowners are not providing optimum areas and how this could be addressed.*

*The farming industry is facing an increasing number of challenges which ultimately test the economic viability and survival of individual businesses such as a turbulent climate, increasing costs of inputs such as fuel and fertilisers, pressure on production from the food security debate, and increasing incidences of bureaucratic inspections, to name but a few. In response, in order to survive businesses must become larger and/or more efficient.*

*The majority of farmers are already carrying out multiple actions to help boost the wildlife and environment on their land, however the only actual mechanism in place to help landowners incorporate environmental land management into their business is agri-environment schemes (AES). It is therefore not surprising that AES is the mechanism relied upon within this Draft to help the continued delivery of environmental farm management.*

*CLA Cymru Wales, however, is concerned that the Action Plan is relying heavily on a CAP budget (both Pillar 1 and Pillar 2 are mentioned in the report as sources), which will see budget cuts under the next programme, along with further demands and policy priorities, which will ultimately lead to much more targeted AES.*

*We therefore believe that CAP and AES should not be relied upon so heavily to help farms to deliver, who would otherwise instead be unable to afford to do so. Alternatively we believe Welsh Government should be looking ahead at other ways in which the habitat farmers provide could be sustained and improved. The Action Plan for example mentioned Payment for Ecosystem Services (PES), but this strand of work has not been built sufficiently into the outcomes. We believe this should be an area awarded more attention with regard to research and investment, as the provision of help for landowners outside CAP becomes more vital.*

*It is also important to recognise the existing amount of regulation in the agri-chemical sector, particularly on pesticides. The UK already has existing structures in place to ensure that any risks to pollinators arising from agri-chemicals are effectively assessed and dealt with accordingly. The Advisory Committee on Pesticides and the Pesticides Forum act as very good mediators in which Ministers are able to discuss the use of pesticides with both the industry and academics. CLA Cymru Wales would welcome Welsh Government's recognition that the total arable area in Wales is relatively small, in comparison to its upland or grassland sectors, and that an equal focus must be placed on amenity users of pesticides in addressing pollinator numbers.*

*We also strongly disagree with references to increasing regulation in the 'Sustaining a Living Wales' section which would place further restrictions on businesses already burdened by a huge amount of red tape, rather than working with and encouraging positive and forward thinking actions.*

**b) The science behind the outcomes**

*There is a huge gap in knowledge when it comes to pollinators, much of which is attributable to the cost and practicalities of such research. In a climate where the balance of species is so delicate, the factors on which they rely are so specific and the reasons for decline not fully explored, we believe a much greater emphasis should be placed on research. The result of not placing research as a higher priority could often be best intended actions with detrimental effects.*

*In order for this to be successful, the research projects currently underway should see more join-up, for example where the report states all current pieces of work, more could be done here to promote synergies and a coordinated approach.*

**c) Broadening of action**

*The Action Plan places huge emphasis on improving the quality of habitats and connectivity, without addressing the funding streams available to do so. In addition to exploring the approach taken with the agricultural sector, we also believe that the plan should do more to address other causes of decline e.g. pathogens and other areas which could contribute e.g. urban areas. Secondly there is a reference to a general lack of national or regional monitoring, which again should be addressed in order to ensure any actions taken are yielding the desired results.*

**Question 4:** how could you contribute further to the areas for action identified? How could we support you to do so?

*The CLA would welcome further input into boosting pollinator populations in agricultural landscapes and believes that the priority is highlighting which mechanisms will be able to do so.*

**Question 5:** Would you like to be involved in developing the actions needed to achieve the outcomes? If so, in what way?

*The CLA would welcome input into the development of actions to ensure a positive response.*

**Question 6:** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

From: Liz Fleming-Williams [<mailto:dwyfnant@btinternet.com>]  
Sent: 04 June 2013 11:31  
To: BioDiversity  
Subject: Pollinator consultation response

I have attached my response to the pollinator consultation.

Cofion cynnes/best wishes,

Liz Fleming-Williams

Dwyfnant, Newbridge-on-Wye, Llandrindod, Powys, LD1 6HP

1. Question 1. Do I agree with your vision for pollinators?

The vision statement ....

*“Wales has the conditions to support healthy populations of wild and managed pollinators to benefit the people, economy and environment of Wales”...*

This vision can only be achieved if all the links in the complicated chain of biodiversity and land use have the knowledge, scientific support and detailed delivery programme that the vision requires. From the Aichie targets and the six targets for the Biodiversity Strategy to Welsh Government land use and planning policy (eg. NERC Act 2006) to all the other bodies and NGO's involved ***delivering this vision will be complex. The success of the pollinator vision will be in the detail, delivery and long term co-ordinated commitment.***

2. Question 2. The main areas of concern for pollinators.

The impact that the loss of pollinators is having on civil society is an indication of scale of the issue that government faces.

The recent publication ‘*The State of Nature*’ has been a wake up call to many who had not previously realised the serious situation we face with regard to massive loss and extinction of species in the UK. The two reports, WG

Pollinator Consultation and the *State of Nature* are both reflections of the damaging impact of land use patterns over the past 50 years.

Pollinating insects have public appeal as they provide an obvious service - food, most obviously honey from managed bees. But other food and crop pollination is carried out by domestic bees and for free by wild insects and bees.

- \* There are more than 170 species of solitary and social bees in Wales. These bees have complex life cycles dependent on undisturbed land for nests and habitats providing pollen, honey sources and hibernation sites. Pollinators vary in the source of pollen and honey they can access: short tongued and long tongued pollinators require a variety of flower types throughout the seasons. There is evidence that some bees perform better if they can access pollen from pea, figwort and mint family flowers, typical of good natural habitats.
- \* Three out of the 25 species of native bumble bee in the UK have become extinct. Others are seriously threatened. Restoring new habitats and protecting existing ones is fundamental to protecting the unassuming environmental service provided by wild pollinators.

The drastic reduction in insect numbers over the past 50 years has resulted in the massive loss of other species eg. wild birds - these should be seen not as a luxury for ornithologists, but as part of the natural resource mechanism which drives the natural world. The large scale loss of unimproved land with its natural variety of plants and the reseeded of species rich grasslands with monocultures with added fertilisers, pesticides and herbicides has been a major driver of this loss.

Well managed biodiversity, providing the rich variety of species, is an important natural resource of Wales as from it other resources flow: clean water, wood, food, human well being, human and animal health.

### 3. Question 4: Areas for Action:

- \* The main area for action is agricultural and forestry policy. Work that I carried out in the late 70's for the Nature Conservancy Council very clearly showed the speed at which semi natural habitats were disappearing as a result of EU subsidies. Agricultural land covers nearly 80% of Wales land area. Hence it is fundamental to the future of domestic and wild pollinators that this land is managed sensitively. The subsidies of the C20th eroded the resilience of the land - in some cases literally: research has shown the massive loss of soil from farmland. Huge swathes of unimproved grassland and woodland were lost to headage payments.
- \* It was in response to this process that the first environmental farming scheme in Wales was introduced in the late 1980's: the Environmentally Sensitive Area (ESA) scheme succeeded in slowing down the huge loss of semi natural habitat, from unimproved grasslands to wetland and woodland - all very important sources of:

- a. Nectar and pollen
- b. Undisturbed habitat that provides nesting sites for wild pollinators.

\* The ESA scheme ended and was followed by a succession of other schemes, Tir Cymen, Tir Gofal, and a not well received Glastir scheme is now in place. But for how long? Pollinators need continuity of habitat; the mountain pansy upland grasslands; the flower rich meadows; the wild clover on hedge margins; continuity of hedgerow care: these are the habitats that have been lost to early silage and monocultural swards eroding the resilience of the land for pollinators.

No food, no habitat.

\*Designations are an important part of Wales' pollinator habitats: SSSI's and NNR's should be seen as the keystone habitats for natural regeneration of pollinator habitats. In many cases these designated sites provide critical sources of natural ecosystems that have been lost elsewhere. Management of these sites in the future should receive increased attention to their management to ensure the long term vitality of biodiversity.

\*In addition support should be given to the rare examples of unimproved meadow that at the moment are not supported by any recognised scheme. I have received many reports of fields that fall through the net of agricultural and conservation support and yet are a source of very important plant and animal habitats. Sometimes this is on smallholdings and sometimes on farms.

\* Organic farming systems must be made to serve pollinator need as well as ticking the organic meat box. It is a challenge to blend the wild pollinator food plants with the production of organic food, but this has the potential to solve some of the problem for pollinators in the long term.

\*Climate change results in a volatility of temperatures that makes a wide range of trees, flowers and bushes in the open countryside critical. In cold springs, exemplified by 2013, a robust variety of species is required to provide pollen and nectar in volatile temperatures.

\*Management of hedgerows for biodiversity is important. Annual cutting of hedges not only reduces the suitability for nesting birds, but massively reduces the potential of hedgerows for pollen and nectar. Hedgerow trees, honeysuckle, dog rose are the iconic sources of nectar and pollen that have been reduced through annual cutting of hedges. A three year cycle would be much more productive.

\*Field margins are a valuable habitat and should be managed accordingly in arable pastures.

\*Where there is unimproved land, grazing regimes should be sympathetic to flowering times eg dandelions.

\*Woodland can be important to pollinators, particularly ancient woodland with a good variety of flowering trees and plants with open areas and good flower rich margins. Any future tree planting should avoid seminatural habitats and unimproved pastures, and where possible connect with existing ancient woodland. New tree planting should consider pollinator opportunities as much as ticking the box for how many trees have been planted.

\*Local authorities can contribute to restoring pollinator habitat in parks, but the current emphasis on road verges illustrates the irony of the situation: having lost most of the herb rich, pollinator friendly pastures on farmland road verges are now seen as saviours. Verges may look pretty to motorists, but on busy roads desperate insects are forced to find nectar in this dangerous location - fly away from the flower and onto a car bonnet! More flower rich habitats must be established away from road verges.

#### \*Church and chapel yards

Church and chapel yards provide on a national scale a scatter of unconnected habitats that in many cases are the last vital source of nectar and pollen from native plants and trees.

The historic and cultural value of the building may be noted but in addition a national programme for supporting chapel and church yards would be valuable: ancient yew trees should go on a national register (a local ancient yew tree was cut down with little consideration given to our national heritage) and the management of the yards should be structured, with financial support, which would ensure the long term resilience of the habitat. Herbicide can be a too easy management tool!

#### \*Gardens and orchards

The role that individuals can contribute to pollinator resilience can be enhanced by a national, well informed policy and guidance on what individuals can achieve through garden plantings of plants and trees suitable for pollinators.

Orchards provide not only good bird habitat, food for people but also useful nectar and pollen sources. Many old orchards have sadly been grubbed up in recent years through agricultural support schemes that encouraged their destruction.

\*A scheme to encourage maintenance of existing orchards as well as establishing new orchards should be a high priority.

#### \*Staff

In order to deliver the visions for pollinators, knowledgeable staff will be a requirement. At a time when NRW is reviewing its future staff needs, one major consideration will be to have a staff that is well informed locally and has a management structure that will deliver Wales wide plans at a local scale. Pollinator resilience requires knowledge and links in the delivery chain that must be robust.

4. Question 4. How could I contribute to further action?

I am involved with the NGO movement in Wales, and am a smallholder and believe that a Wales wide joined up policy that links up the various landuses, through supporting the many organisations and individuals involved with the land would be a big step up for pollinators. Pollinators are not on the edge of policy, they should be at the heart of it.

5. Question 5. Would I like to be involved in developing the actions to achieve the outcomes?

I would be pleased to be involved in any way I can at an advisory level.

6. Conclusion:

**\*Cae Yspty** (hospital field) was an unimproved pasture where a farmer traditionally put a sick animal. The variety of natural antibiotics and minerals naturally occurring in the plants growing in the field usually resulted in the animal returning to health.

It is those flower rich meadows, of which we have lost 98%, that would have provided the nectar and pollen to support a resilient insect population....absorbing the natural minerals and natural antibiotics from a wide ranging variety of naturally growing species. Scattered through the landscape the flower rich meadows of Wales had the opportunity to make the pollinators more resilient to disease.

\*Is it the lack of these natural remedies, from a huge variety of sources, which is a possible cause of pollinators becoming more vulnerable to diseases such as Varroa mite? Could this also be a significant contribution to the massive reduction in insect numbers?

Through this pollinator consultation Wales has the opportunity to set a European, if not world wide, example of sustainable agriculture through a visionary policy that delivers in detail at the local level. An imaginative policy that delivers for the farmers, the people of Wales and the future of the critical pollinator population. The health and resilience of all are linked.

Wales is well known for the Physicians of Myddfai, a theme that recently won the National Botanic Garden of Wales an award at the Chelsea Flower Show. Many of the herbs used in the medicines in the C12th were from wild flowers, plants and trees, and the honey collected by bees from those flowers. At the time the physicians were practising the natural plant sources would have been an unrecognisable paradise compared with today. The argument now is that food scarcity is the driver of land use. It is essential to reflect on the incredibly reduced flower sources that bees have today compared to the time of Rhiwallon, and blend land management more sensitively with pollinator requirements.

\* It is irrefutable that insect numbers, including pollinators, have diminished in recent years. In the creation of Natural Resources Wales, with a Minister of Natural Resources **and Food** we have the potential to link up agriculture, forestry and water management to deliver ecosystems which are:

1. resilient for pollinators
2. providing for healthy soils
3. confirming the long term health and resilience of Wales' natural resources.

\*In addition the invigorated agricultural schemes could provide a critical driver for encouraging the next generation of farmers, which at the moment is an issue in rural Wales. Imaginative, financially viable initiatives that have a C21st acumen could deliver for our language, our culture and communities as well as the pollinators.

\*A new scheme, or a drastic revision of Glastir, is required that delivers for pollinators as well as other environmental and farming issues. The scheme should be managed by a mix of environmentally knowledgeable staff as well as those from an agricultural background. Glastir has struggled due to a significant lack of environmental knowledge.

Welsh Government needs to focus on the complex issues affecting pollinators and ensure that focussed actions are enabled. Environmental issues such as loss of pollinators evolve incrementally over decades where no one body, organisation or department has taken responsibility.

\*Making sure that pollinator numbers recover will depend on creative, focussed, policy driven targets with connected government departments that are well funded and staffed.

## **Consultation Response Form**

Your name: Dr Lizzie Jones and Debbie Harding

Organisation (if applicable) NERC and BBSRC

Email/telephone number: [elne@nerc.ac.uk](mailto:elne@nerc.ac.uk), [debbie.harding@bbsrc.ac.uk](mailto:debbie.harding@bbsrc.ac.uk)

Your address: NERC, Polaris House, North Star Avenue, Swindon, Wiltshire, SN2 1EU.

**Question 1:** Do you agree with our vision for pollinators in Wales?

Yes.

**Question 2:** Have we identified the main areas of concern for pollinators in Wales or are there further issues you want to identify?

Probably. It is not clear whether the issues identified in the document are specific issues in Wales or whether they are also relevant to the wider UK and also globally. If the issues are the same as in the UK and globally perhaps there could be some plans to link up with activity elsewhere (or if there is no activity elsewhere then perhaps you could lead others and indicate how you might do this). Areas of concern cannot be dealt with in regional isolation so this broader picture is important.



There is no detail of the process and evidence used for the Rapid Evidence Assessment and the reference mentioned is unpublished. This means we cannot know how robust these conclusions are.

**Question 3:** Do you agree with the outcomes identified, and the areas for action to achieve them? Your comments are welcomed.

Broadly. It is often difficult to see who will be responsible for the actions. There is no mention of timescales or milestones. There are many partners referred to but it is difficult to see whether these partners are on board and positive about the actions you suggest and what jurisdiction you have over them. If particular stakeholders or stakeholder groups are unwilling to adopt your recommendations, what can you/will you do?

Apart from a quick mention at the end of the document, there is no real discussion of how you will monitor success of these actions. The quick reference implies it will be simple but this is actually a very complicated system/process and it is difficult to actually measure changes.

**Question 4:** How could you contribute further to the areas for action identified? How could we support you to do so?

Please ensure that the Insect Pollinators Initiative Programme Management Group is known to you and linked in so that we may provide information and experiences from the initiative.

**Question 5:** Would you like to be involved in developing the actions needed to achieve the outcomes? If so, in what way?

See above.

**Question 6:** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please see comments and edits within the document.

It is not entirely clear from the document which groups it is aimed at. Is it purely for Government purposes or is it also for the benefit of other stakeholder groups, such as beekeepers, wildlife charities, farmers, fruit-growers?

**From:** Wendy Larcombe [mailto:w.larcombe@neath-porttalbot.gov.uk]

**Sent:** 05 June 2013 13:52

**Subject:** RE: Consultation on the Draft Action Plan for Pollinators for Wales

Wendy Larcombe  
Habitat Surveyor  
Countryside & Wildlife Team

## **CONSULTATION ON THE DRAFT ACTION PLAN FOR POLLINATORS FOR WALES**

**Question 1: Do you agree with our vision for pollinators in Wales?**

Broadly speaking, yes. However, the Plan appears to be more of an “aspirational vision” than an Action Plan. We would like to see more detailed and targeted actions as the Plan does not make it clear what is expected to be delivered by whom.

**Question 2: Have we identified the main areas of concern for pollinators in Wales or are there further issues you want to identify?**

We believe that the main areas of concern have been identified. However, while we agree that it is important to tackle invasive species, we feel it is necessary to highlight that consideration of the timing of herbicide application must be given, as bee colonies are being affected when feeding on flowers such as Himalayan Balsam. Guidance on best practice, including an alert system (to warn bee keepers in the locality) should be used as standard practice

**Question 3: Do you agree with the outcomes identified, and the areas for action to achieve them? Your comments are welcomed.**

Yes we agree. Additionally, Area 1 alludes to improving conditions for pollinators on Farmland. With regard to Orchards in particular, it would be suggested that linking in with Peoples Trust For Endangered Species “Traditional Orchard Survey” data, gathered 2012 would be beneficial. Support is needed to encourage land owners to restore, manage and create Orchards for a variety of wildlife as well as pollinators. Incentives through funding from WG to local authorities / developers / other parties need to be fully explored. Existing or potential landscaping schemes could easily incorporate pollinator friendly planting and should be built into schemes being delivered through WG funding.

There are schemes in place which offer developers an opportunity to enhance biodiversity as part of development, e.g. BREEAM, but the opportunities are rarely taken. In addition, the BREEAM process is flawed in relation to the biodiversity provision; it concentrates on species numbers rather than habitat quality. This leads to either inappropriate species planting to reach the increase in species numbers required to achieve BREEAM points or developers avoid the biodiversity section entirely due to the points being difficult to achieve. Provision for pollinators can often be easily accommodated in a scheme but the potential benefits to the residents or wider public are often overlooked and undervalued, and the loss of such opportunities results in the creation of almost identical landscaping schemes throughout a county (often using non-native species).

**Question 4: How could you contribute further to the areas for action identified? How could we support you to do so?**

As an Authority we are looking at identifying a set of SINC sites which we wish to pursue appropriate management on. We could concentrate on those which are likely to provide foraging for pollinators together with those chosen for their connectivity value.

We also have a number of land management schemes principally to manage grassland along some of our roadside verges, and around various playing fields and parks. We apply annually for funding to undertake regular and one-off management tasks.

Support required:

We would like to work closer with local businesses and housing associations to encourage more sustainable, and pollinator friendly management of their soft estate. Further funding opportunities for projects and ongoing management of areas would be helpful to encourage the Local Authority to deliver new projects and sites of pollinator-friendly habitat; along with continuing appropriate management of existing sites. Funding would also help to provide needed awareness raising materials and officer time to survey land and offer incentives to manage sites appropriately.

**Question 5: Would you like to be involved in developing the actions needed to achieve the outcomes? If so, in what way?**

Yes. As a Local Authority we would like to be involved in developing actions that can be delivered and expanded upon through our existing land management schemes whilst ensuring that such actions do not place additional financial burdens on the Authority. We would also like to be involved in developing actions that could be achievable through the planning process, whilst again aiming to avoid placing little financial burden on developers.

From: John Mosedale [<mailto:johnmose8@hotmail.com>]

Sent: 09 June 2013 15:00

To: BioDiversity

Subject: Draft Action Plan for Pollinators

The past 5 years have had appalling summers. We are told we might expect this to become the norm with climate change. Honey harvests have been depressed as a consequence, and many colonies of honey bees have been lost.

Last year was particularly bad, and you will be aware from the press reports of the impacts on honey bee colonies and honey production. Beekeepers cannot afford to maintain colonies when there is a consistently poor honey harvest, not gain sufficient income to pay for the treatments needed to keep colonies healthy.

In several parts of Wales, one of the main sources of nectar for honey bees has been Himalayan Balsam. This thrives in damp conditions. So in the recent wet summers, I know from my own colonies that it is the nectar from Balsam that provides most of their autumn stores to keep them fed through winter, and give a reasonable crop of honey, albeit very late in the season. Therefore, when considering where, how and how much you will combat Invasive Alien Species, (EU Biodiversity Target 5), please consider the impact you will have on honey bee colonies in Wales. I suggest that in some areas, e.g. Bridgend, that eradication of Balsam would have a devastating impact on honey bees, and honey production to provide their winter stores in for their survival.

Blanket eradication might otherwise have impacts on pollinators that you did not expect.

John Mosedale FICE, CEnv, CWEM

From: confidential  
Sent: 10 June 2013 00:30  
To: BioDiversity  
Subject: Consultation on the Draft Action Plan for Pollinators or Wales.

Dear Sir,

Numerous scientific reports point to pesticide (not neonicotinoids alone) as being a major problem in bee decline as the bee is particularly sensitive to pesticide as it has fewer enzymes that process chemicals. Pesticide lowers the bees' immune resistance to things like the varroa mite and various other pests and diseases. The decline in bees, butterflies, birds and other wildlife began when insecticides were introduced alongside intensive farming after World War II. Nerve agents were discovered when they were being researched for use on the human enemy during the war. These were then used as 'pest' control, the latest being the 'systemic' type which have sped up the death in bees to a point where people have finally noticed the destruction that this type of farming method can wreak on the environment (human health) and insect and wildlife.

This now should be a turning point in that organic farming is given greater grants from the government than intensive farming where insecticides are used. Crop rotation in smaller fields can be the key to pest control and complementary planting. Hedges between smaller fields also harbour predators that can control the 'pests'.

Another suggestion would be to make sure that all research carried out to look into bee decline is not in any way linked to the biotech companies, nor any English Gov/biotech/GM companies. I noticed recently that Rothamsted Research has linked up with the UK Butterfly Conservation to apply for an early day motion for a grant to look further into the huge loss of moths. Rothamsted Research are heavily involved with Biotechnology and GM field trials, (presently re-applying for open wheat field trials) therefore they have an interest in continuing the use of neonics and all pesticides, biased reports would appear a dangerous problem. In England we have a problem of 'conflict of interest' with some MPs who have strong links to the biotechs.

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4th June 2013

Dear Sir/Madam

### DRAFT ACTION PLAN FOR POLLINATORS

Thank you for consulting us on the above document.

The North Wales Wildlife Trust is a registered charity and one of the leading non-governmental conservation organisations in North Wales. We have over 5000 members and 33 nature reserves across North Wales (6 of which are on Anglesey). In addition to the management of these nature reserves we work with a wide range of other organisations to further the protection of biodiversity in the countryside.

The Wildlife Trust supports the principle of an Action Plan that aims to improve conditions to support healthy populations of pollinators in Wales. This is a fantastic opportunity to make a real difference for pollinators in Wales and lead the UK in pro-active conservation.

To really tackle the decline of pollinators in Wales, **the action plan must be bold and visionary**. However, this document is more of a strategy than an Action Plan. The Wildlife Trust would expect another iteration of this plan with defined measurable actions.

The strategy is simple - The absence of flowers throughout the landscape is a major factor limiting the number of insects available for the pollination of wild flowers and agricultural crops. Therefore, we need to put a diverse range of wildflowers back into our countryside and towns, as well as the other important aspects of pollinators life cycles (shelter, nesting habitats etc). It should be made clear that what is required is that both the area and quality of habitat that needs increased. **We need bigger, better and more connected habitats.**

The Welsh Government and Local Authorities must lead the way by

- Undertaking a meaningful overhaul of the Public Estate (including Local Authorities, hospitals etc.) and change the management of our parks, road verges and 'amenity grassland'.
- Getting correct agricultural policies and funding in place to encourage and enable landowners to support pollinators in the farmed and wider environment.
- Supporting environmental NGOs in their work to increase biodiversity.

This issue of pollinators has widespread public support as evidenced with grassroots campaigning for the EU pesticide ban. The process and outcomes must not be allowed to go back to business as usual. This will require **a strong, statutory and policy steer from Welsh Government** – with implementation linked to Departmental or Public Body budgets. For example, lack of implementation will necessitate financial penalties via budget cuts.

Therefore, while we welcome the approach the consultation advocates, we now look to the Government to show leadership, remove obstacles and silo-mentality, to take bold steps and make brave decisions to help create **Living Landscapes** within a **Living Wales**.

I have set out our detailed response in Annex 1. Once again, thank you for the opportunity to comment on this document.



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Yours sincerely,



Chris Wynne  
Conservation Officer

## ANNEX 1 - DRAFT ACTION PLAN FOR POLLINATORS

### QUESTION 1: DO YOU AGREE WITH OUR VISION FOR POLLINATORS IN WALES?

The Wildlife Trust welcomes the Welsh Government commitment to producing a pollinator action plan. The forthcoming action plan should be bold, **visionary and ground-breaking**. It should set *the* example for the rest of the UK countries to follow.

However, this document doesn't go far enough to make a meaningful difference to our pollinators. It is not an Action Plan as it lacks defined measurable actions. The Action Plan should be produced with stakeholders, using **a task and finish group** format. It should be SMART - containing costed, measurable and realistic actions and firm commitments to actions by the Welsh Government for the Public Estate.

We would also like to see some recognition of the intrinsic value of the pollinating insects themselves not just their benefits to man.

### QUESTION 2: HAVE WE IDENTIFIED THE MAIN AREAS OF CONCERN FOR POLLINATORS IN WALES OR ARE THERE FURTHER ISSUES YOU WANT TO IDENTIFY?

The five main areas of concern go some way to identifying the major threats, and we are pleased to see an emphasis in the action plan on increasing the provision of high quality and better connected habitats to support wild and managed pollinator populations. However, it should be made clear that what is required is both **area and quality of pollinator friendly habitat that needs increased**. Bigger, better and more connected habitats (as promoted by the **Lawton Review**).

This will require **a strong, statutory and policy steer from Welsh Government – and should be included in the forthcoming Environment Bill**.

It is also worth highlighting the use of avermectins and the impact they have on coprophagic species. These species provide vital nutrient recycling services.

### QUESTION 3: DO YOU AGREE WITH THE OUTCOMES IDENTIFIED, AND THE AREAS FOR ACTION TO ACHIEVE THEM? YOUR COMMENTS ARE WELCOMED.

The Wildlife Trust agrees with the sentiment of the outcomes but believe that **what is proposed could go much further** and the Action Plan in its current state will not be able to achieve the vision for pollinators in Wales. There is a mismatch between the 'Outcomes' and the vagueness of many of the 'Actions', many of which are unspecific and aspirational rather than clear and deliverable.

### AREA FOR ACTION 1 (FARMLAND)

The majority of Wales is farmland of some sort and therefore getting this right may well be the key. **Modern agricultural practices, perverse subsidies and pervasive pesticides have all contributed to the massive decline** in wild and managed pollinators in Wales and the UK.

The absence of flowers throughout the landscape is a major factor limiting the number of insects available for the pollination of wild flowers and agricultural crops (Potts *et al.*, 2010, Carvell *et al.*, 2006).

There may be “simple measures” that can help achieve this but fundamentally substantial areas need to be managed in a completely different way – **bigger, better and more connected areas** of wildflowers and other sources of pollen and nectar.

What control can the Welsh Government have outside land that they manage? The truth is that the agricultural subsidies play a large part of the income farmers receive in Wales. Without these subsidies many farms in Wales could not survive. Therefore, **agricultural subsidies have the potential to deliver for pollinators**.

However, there are a number of issues that **agricultural subsidies** (and thus **RDP**) must address before it can fulfill this aspiration, such as;

- Glastir was not designed specifically for increases in pollinators and therefore changes to the prescriptions would be required. Pollinator-friendly options must be mandatory e.g. **Pillar 1 payments**.
- Uptake – Glastir is a voluntary agri-environment measure and thus ensuring an adequate level of uptake is essential. Currently **Glastir is undersubscribed and action is needed to increase participation**.
- Welsh Government would also need to provide a suitable incentive mechanism to encourage uptake of relevant ‘pollinator-friendly’ Glastir options, as well as sufficient support for landowners to ensure that they are able to fulfil the requirements of those options.
- Welsh Government must use the expertise within the NGO community more in relation to giving advice to landowners. **RDP money could be used to mainstream the provision of agri-environment advice into environmental NGOs** such as the Wildlife Trusts, Bumblebee Conservation Trust and Butterfly Conservation.

Other actions that should be integrated into agricultural subsidies and the action plan include

- Traditional farmland habitats such as **hedgerows, scrubs and trees are also important for pollinators**. The Action Plan should also encourage sensitive planting of important habitats on farmland (but not on existing important habitats), as they can provide valuable food, nesting habitat, shelter for flying insects as well as sources of pollen.
- Ensuring that the **woodland creation option is integrated with primary ‘pollinator-friendly’ options** (such as maintaining/ restoring existing flower-rich habitats, allowing field strips and corners to remain uncut/ grazed etc) would help to create a holistic suite of measures to improve conditions for pollinators.
- The increased use of **appropriate clover-leys** would do much to improve habitats for bees (some agricultural clover flowers are not pollinator friendly).
- Supporting the **fallow margins options** which will benefit all the local pollinators in an area by allowing wild plants to develop and thus work in combination with the clover in grass leys on pastoral farms.
- The Welsh Government should explore the principles of **High Nature Value farming**, which would also contribute to the objectives of providing higher quality pollinator-friendly habitat.

#### **AREA FOR ACTION 2 (WIDER COUNTRYSIDE)**

The absence of flowers throughout the landscape is a major factor limiting the number of insects available for the pollination of wild flowers and agricultural crops (Potts *et al.*, 2010, Carvell *et al.*, 2006).

##### *Connectivity*

The Wildlife Trust supports the need for a network of diverse and connected flower-rich habitats across Wales. A key part of this is connectivity and **green infrastructure**. In terms of habitat provision on a **landscape/site scale**, it is beneficial to consider how habitat provision for pollinators can dovetail with habitat provision for other wildlife. For example, habitat management for pollinators in damp/wet habitat could also benefit water voles, otters, odonata, plants and breeding birds if considered appropriately.

### *Welsh Government Estate*

**The Welsh Government must manage the Welsh Estate (all land in public ownership), in partnership with environmental NGOs such as the Wildlife Trusts. They must create pollinator friendly policies that enable land to be brought into multi-functional use – that works for people, wildflowers and pollinators.** As such, the Welsh Government must be an exemplar to other landowners, demonstrating what can be achieved within a variety of settings - from urban offices to farmland.

### *Local Authorities*

We recognise that **local authorities have a huge role to play in delivering habitat for pollinators**, especially in terms of connectivity. Therefore, we are surprised at the omission of **road verge management** in the consultation document. Our road verges include some of the last remnants of wildflower meadows in the UK (98% of which have been lost or degraded).

There are good examples, the Wildlife Trust works with the Anglesey Council to maintain a suite of floristically **rich roadside networks**. However, this good example is not universal. Some councils don't have roadside verge policies and those that do either many not be effective or have been reversed (e.g. Denbighshire Council).

**Statutory Guidance for Local Authorities is sorely needed on the management of road verges for pollinators** and other wildlife, without which wildflower-rich habitats will continue to be degraded and lost from road verges due to the continuation of inappropriate cutting regimes i.e., before wild plants have had a chance to flower and set seed. See

<http://www.independent.co.uk/environment/nature/mown-down-the-wildlife-toll-on-uks-roadsides-8640800.html>

**Local Authorities must adopt and implement a Road Verge, Wildflower and Pollinator Action Plan** – based on Welsh Government, NRW and NGO template. Adoption and implementation of this policy should be a condition of the Welsh Government LA Grant.

### **Case Study**

Denbighshire County Council worked with the Wildlife Trust to create a Road Verge Policy. This Policy was looking at cutting rural verges in a more wildlife-friendly way so that wild plants can flower and set seed. Initially, two pilot areas were identified and managed much less intensively by delaying the timing of cutting till late summer / early autumn and avoiding cutting too low to minimise damage to soils.

This only occurred where road safety would not be compromised. The pilot project has been a great success and has demonstrated that simple alterations to road verge management can bring great rewards to biodiversity at no extra cost (and may actually save money in the longer term). The policies proposed by the project also contributed to delivery of targets set out in the UKBAP and Denbighshire LBAP to protect and enhance biodiversity.

In due course these policies were extended to other areas, including the Denbigh Moors and eventually the whole rural road network in Denbighshire. However, in autumn 2011, after a small number of complaints to local councilors about the verges looking 'untidy', Denbighshire County Council's Scrutiny Committee reversed the road verge policy, despite having produced thousands of leaflets that highlighted it to the public.

Developing comprehensive and measureable **road verge management** schemes should be a clearly defined action. This will require working closely with and supporting local authorities to help them change their practices – e.g.

- adjustments to contracts with external contractors,
- collection of grass cuttings to prevent nutrient rich soil conditions developing on verges where practicable etc.
- adjusting mowing regimes may also require additional litter picking and information to win over the public and address any concerns over road safety.

### *Biodiversity Champions*



We welcome the emphasis on protection and management of habitats which benefit pollinators but question whether **Local Authority Biodiversity Champions** are the right vehicle. The Wildlife Trusts fully support and value the role of Biodiversity Champions but they are not supposed to be “experts” and are often not in place for long enough to achieve continuity.

There is no indication of what support they would be given and we feel that ultimately, the plan would therefore rely on the Local Authority Ecologist and Biodiversity Officer. These roles are already constrained or under resourced in many local authorities, therefore any additional targets placed on these officers should be supported by appropriate funding.

#### *Wildlife Sites*

It is important to link up valuable habitats and also link up statutory and non-statutory sites. The Action Plan must also recognize that many designated sites are not in favourable condition and much work is needed to restore and protect these habitats through beneficial management. We welcome the inclusion of **Sites of Importance for Nature Conservation (SINC)**.

They protect threatened species and habitats which act as buffers, stepping stones and corridors between nationally-designated wildlife sites. The Wildlife Trusts have worked with local authorities, statutory agencies, landowners and other local partners to establish effective systems for identifying, managing and monitoring Local Wildlife Sites.

The Action Plan should recognise the current vulnerable position of these non-statutory sites across Wales, as they receive very little protection or beneficial management. The planning system that does not give sufficient weight to their protection even though they **deliver multiple ecosystem services**.

The Welsh Government must recognize these sites as vital links in a chain to protect our pollinators and support organisations that seek to identify, protect and manage them. **The ultimate aim should be to have a functioning Wildlife Sites system across Wales** which helps landowners to manage their sites, by providing advice and small grants. It is important to ensure that this allows landowners to maintain as well as restore valuable habitats.

There are existing and proposed regional wildlife sites projects which could be supported in the action plan, we are working closely with Isle of Anglesey County Council and Cofnod (the local environmental records centre) to develop such a system there. **The work contributes significantly to the delivery of UK, regional and local biodiversity action plans** and associated targets through the identification and improved management of Local Wildlife Sites. The work could be considerably extended to provide botanical surveys plus expert wildlife and management advice to landowners, as well as access to financial resources to enable much needed management works. The impact and future longevity of the work will be strengthened by engaging local communities in the restoration and management of sites, and by nurturing an appreciation of the value of the sites and developing the skills to care for them.

#### *Stakeholder Projects*

All Wildlife Trusts and some other environmental organisations already have projects, at different scales, from local projects to landscape scale partnerships. The Welsh Government should look to support this work and work in partnership with these organisations to create a **‘best practice for pollinators’** guide.

The Wildlife Trusts, along with other organizations, manage **nature reserves** to benefit all wildlife including pollinators. For example, in North Wales we managed 34 nature reserves covering 690 ha. Our management of heathlands creates an important late summer pollen source. The Welsh Government should work with these organisations to **create Living Landscapes within a Living Wales**.

#### *Orchards*

The creation and restoration of **traditional orchards** would also benefit pollinators, especially where the grassland within the orchard is also managed as a meadow/pasture. Orchards can also contribute to

the local and national economy through production of artisan products such as cider and perry. The action plan could also consider the benefits of promoting forest gardens and permaculture.

### Case Study

The Wildlife Trust, with funding from the Welsh Government, set up the North East Wales Orchard Initiative (NEWOI) in order to plant new orchards to protect old fruit varieties. The project aims to restore local fruit growing and all its benefits throughout Wrexham, Denbighshire and Flintshire. Well-managed orchards produce good quality local food and are places where wildlife thrives. Birds and butterflies value windfalls in autumn, the grassland is often full of wildflowers, and decaying timber is food to a multitude of insects. The project brought old orchards back into productive use for wildlife and people as well as creating new orchards. It created a living demonstration of how important wildlife-rich habitats are to people.

### AREA FOR ACTION 3 (TOWNS, CITIES AND DEVELOPED AREAS)

It is an important objective to promote flowering habitats and landscapes of benefit to pollinators in our towns, cities and developed areas. It provides a chance to highlight the need for pollinators to the widest population.

The Draft Action plan states that the Welsh Government will “...continue to incorporate pollinator friendly policies across our administrative estate...”. However, little evidence was given to suggest what the Welsh Government is doing. The Welsh Government should be setting the example, and therefore what they are doing on their estate should be made public so that it can be measured and good practice shared (and bad practice avoided).

However, there is no mention of **requiring Local Authorities to manage their estates, parks and public spaces** in a pollinator-friendly way. This, along with the Welsh Government estate, is the ‘quick win’ and would be a huge **missed opportunity if not included**. This includes industrial parks, hospital grounds, police stations and Local Authority buildings.

**Remember space is three dimensional – so Local Authorities and other landowners should be encouraged to make imaginative use of walls, roofs and other structures by using climbers and placing bee hives and window boxes on buildings or in grounds.**

It is vital that Local Authorities follow the lead of the Welsh Government in incorporating pollinator-friendly policies across its administrative estate. **Local Authorities must adopt and implement a pollinator action plan – based on Welsh Government (and NGO) template. Adoption and implementation of this policy will be a condition of the Welsh Government LA Grant.** Only with a Welsh Government directive, and linked to Local Authority Grant will this be achieved.

Detailed case study examples from local authorities where a change in management has been successful would be extremely helpful as a good practice guide.

Actions could include pollinator friendly bedding plants, flower-rich road side verges, wildflower meadows in parks and using ‘amenity grassland’ to provide multifunctional benefits. The current situation with **excessive grass cutting** and the **use of bedding plants with no value to pollinators is not acceptable**. This includes swapping non-native daffodils for native Welsh daffodils that not only are beneficial to pollinators but also withstand the Welsh climate better than the tall, weak cultivars that collapse on themselves at the first sign of a breeze.

Promoting wildlife gardening or the principles behind wildlife gardening would not only create additional pollinator friendly habitats but raise awareness also. See Case Study below;

### Case Study

North Wales Wildlife Trust, with partners, organize many wildlife gardening initiatives. These include

- **Community Gardens;** Green field sites, parks and gardens – nectar borders, meadows and wild flowers, hedge and tree planting, ponds, bird and bat boxes, insect homes and habitat, composts etc. Over 50 different sites

- **Churchyards** - Living churchyard project in Flintshire – meadows, trees, composts, insect homes. About 10 projects at present.
- **Schools** - nectar borders, meadows and wild flowers, hedge and tree planting, ponds, vegetable gardens, orchards, bird and bat boxes, insect homes and habitat, composts, etc. Advice or practical help in over 200 schools.
- **Business gardens**, e.g. orchard and allotment creation with Toyota, pond building at Bangor University site

#### **ACTION 4: SUPPORTING UK ACTION TO PROMOTE HEALTHY POPULATIONS OF POLLINATORS IN WALES**

We support action to continue to implement the Healthy Bees Plan, however, the remainder of the ‘actions’ are rather vague. THE WILDLIFE TRUST would expect the final action plan to contain more targeted and measurable actions.

#### **ACTION 5: WORKING TO RAISE AWARENESS OF THE IMPORTANCE OF POLLINATORS AND ENGAGE OUR CITIZENS IN THEIR MANAGEMENT**

We support the need to raise awareness of the importance of pollinators amongst the public, landowners, schools, businesses and local authorities. The Wildlife Trust and other environmental NGOs have a wealth of experience and material available for engaging with these groups.

We would encourage Welsh Government to further its commitments in helping stakeholders continue this work.

#### **Case Study**

North Wales Wildlife Trust, with partners, undertake many wildlife gardening projects that are designed to raise awareness, such as

- **Wildlife Garden Competition** with feedback from judges on how to optimise bee and other wildlife habitat in Private, School, Community and Business gardens. Coverage: Gwynedd, Conwy, Anglesey. Entrants: about 55 per year. Annual event for 8 years, subject to funding availability.
- **Wildlife Garden Open Days** – Best examples of gardens identified through the competition. Coverage: Gwynedd, Conwy, Anglesey. Visitors about 700 per year. 3 year project.
- **Open days – bee specific events** to be held spring/summer 2013 in Partnership with Friends of the Earth and Snowdonia Society. **Presence at other events** such as farm shows, town festivals, community days, etc. **promoting wildlife friendly gardening.**
- **Illustrated talks** – various community groups and professional organisations.
- **Training** – day and half day courses on how to create a meadow, nectar borders and a wildlife garden in general. Venues: Rhyd y Creaua Field Study Centre, Antur Waunfawr, Pensychnant Conservation Centre and schools in North Wales.
- **TV, radio and newspapers** -regular presence in English and Welsh speaking media.

In addition, the impact of **invasive alien species** should be considered, e.g. **Himalayan Balsam**. Many beekeepers see this as an important plant however, non-native invasive species are regarded as the second biggest threat to biodiversity (after habitat loss). For example, if allowed to remain, Himalayan balsam can outcompete native plant species, greatly reducing biodiversity and negatively impacting on the native ecosystems. By exposing bare soil when it dies back in winter, it causes soil erosion leading to sediment entering the river that can silt up spawning grounds. Also the bare soil can lead to a faster rate of rainwater entering the river from surrounding farmland resulting in greater amounts of fertiliser

running into water systems, degrading the chemical status of the water. **Controlling invasive species will help to maintain ecological diversity and therefore pollinators.**

We support the use of Gwlad and Farming Connect to engage with landowners about pollinators. We would ask that there is a more firm commitment to doing this. Many environmental NGOs also give advice to landowners but this advice is ad hoc and not mainstreamed. Therefore, Welsh Government could fund environmental NGOs such as the Wildlife Trust to mainstream this advice into their workplans.

#### **ACTION 6: LINKING TOGETHER WELSH GOVERNMENT POLICIES TO PRODUCE BENEFICIAL ACTIONS THAT ARE GOOD FOR POLLINATORS AND THEREFORE WIDER ECOSYSTEM HEALTH**

The Wildlife Trusts welcomes the principle of linking together Welsh Government policies to ensure an integrated approach to biodiversity. However, it is unclear from the points in the consultation document how Welsh Government are going to do this. More clarity is required.

**It is vital that an action plan is created for, and is backed by, each ministerial portfolio.** The widespread use of the public estate cannot be achieved if there is not buy-in from other departments. This should be integrated into outcomes such as health benefits, social justice (access to greenspace), tourism, flood attenuation, planning – all new applications for housing estates should include pollinator friendly planting etc.

#### **ACTION 7: BUILDING AN EVIDENCE BASE TO SUPPORT FUTURE ACTION FOR POLLINATORS**

While we support building an evidence base in general, there currently is a large amount of evidence already to justify the urgent action required. It is important that we monitor the effectiveness of action in order to adapt or discontinue actions that are not working and roll out actions that are successful.

#### **QUESTION 4: HOW COULD YOU CONTRIBUTE FURTHER TO THE AREAS FOR ACTION IDENTIFIED?**

**How could we support you to do so?**

- The Wildlife Trust actively manages 690 ha of reserves most of which are important for pollinators such as heathland at **Gors Maen Llwyd** and species rich grassland such as **Caeau Tan y Bwlch** Nature Reserve

The Trust also undertakes a variety of projects within and outwith their Living Landscape schemes such as

- our **Wildlife Gardening** work referred to above
- the **Alyn and Chwiler Valleys Living Landscape project**
- the **AONB funded Anglesey Breeze project** which aims to involve all aspects of the local community in wildlife

Therefore, Welsh Government help with such schemes are vitally important.

As mentioned above, **many environmental NGOs also give advice to landowners. Welsh Government could fund environmental NGOs such as the North Wales Wildlife Trust to mainstream this advice into their work plans.**

The Wildlife Trust can support the further development of clear and deliverable actions as well as provide advice and services to monitor outcomes.

#### **QUESTION 5: WOULD YOU LIKE TO BE INVOLVED IN DEVELOPING THE ACTIONS NEEDED TO ACHIEVE THE OUTCOMES? IF SO, IN WHAT WAY?**

Yes. The North Wales Wildlife Trust would welcome involvement in developing the actions as we have both technical and project management expertise which could help develop actions. We suggest that a **Task and Finish Group**, with Welsh Government and stakeholders, is set up to develop the next phase of the Action Plan.

**QUESTION 6: WE HAVE ASKED A NUMBER OF SPECIFIC QUESTIONS. IF YOU HAVE ANY RELATED ISSUES WHICH WE HAVE NOT SPECIFICALLY ADDRESSED, PLEASE USE THIS SPACE TO REPORT THEM:**

The Wildlife Trust supports the principle of an Action Plan that aims to improve conditions to support healthy populations of pollinators in Wales. However, this document is more of a strategy than an Action Plan, and is lacking in defined measurable actions. **The final Action Plan will need SMART actions and achievable targets and outcomes**, along with some substance to monitor actions and result indicators to measure progress.

To really tackle the decline of pollinators in Wales, **the action plan must be bold and visionary**. This must not be allowed to go back to business as normal. The duty placed on Public Authorities by the **NERC Act 2006** to preserve biodiversity **is already too often ignored and the Welsh Government should take steps to ensure that this situation does not continue**. The Welsh Government and Local Authorities must lead the way by undertaking a major overhaul of the Public Estate.

This will require a strong, statutory, steer from Welsh Government – with implementation linked to Departmental or Public Body budgets. For example, lack of implementation will necessitate financial penalties via budget cuts.

**This is a fantastic opportunity to make a real difference for pollinators in Wales and lead the way for the UK**, but the current document doesn't go far enough. We have to think bigger to make sure that we don't miss our chance in enhancing Wales' habitats for pollinators and boosting the populations of bees, hoverflies and other pollinating insects – as well as the other wildlife that relies on them.

**The following are examples of potential actions that should be implemented**

- Local Authorities and Highways Department to adopt and implement a Road Verge Policy – based on Welsh Government, NRW and NGO template. Adoption and implementation of this policy will be a condition of the Welsh Government LA Grant.
- All Public Bodies and Government Departments to adopt and implement a wildflower and pollinator action plan – based on a Welsh Government, NRW and NGO template. Adoption and implementation of this policy will be a condition of the Welsh Government LA Grant.
- Include mandatory pollinator friendly options in Glastir and Pillar 1 'greening' payments.
- Glastir should encourage the creation of species rich grassland.
- Welsh Government must use the expertise within the NGO community more in relation to giving advice to landowners. By using RDP money to mainstream the provision of agri-environment advice into environmental NGOs such as the Wildlife Trusts, Bumblebee Conservation Trust and Butterfly Conservation.
- Development and implement a heather creation and restoration strategy – this would involve funding environmental NGOs to deliver new heather creation and also undertaking heather creation/open ground habitats on the Public Estate.
- Woodland creation schemes / restoration schemes should prioritise pollinator friendly planning.
- Welsh Government should support high profile conservation efforts such as Shril Carder Bee which then can be used as a public engagement tool.
- Commit funds to fully implement the flies and wasps on the Section 42 list
- Traditional farmland habitats are also important for pollinators such as hedgerows, scrubs and trees. The Action Plan should also encourage sensitive planting of important habitats on farmland (but not on important habitats), as they can provide valuable food, nesting habitat, shelter for flying insects as well as sources of pollen.
- Ensuring that the woodland creation option is integrated with primary 'pollinator-friendly' options (such as maintaining/ restoring existing flower-rich habitats, allowing field strips and corners to remain uncut/ grazed etc) would help to create a holistic suite of measures to improve conditions for pollinators.
- The increased use of clover-leys would do much to improve habitats for bees.

- Supporting the fallow margins options, which will benefit all the local pollinators in an area by allowing wild plants to develop and thus work in combination with the clover in grass leys on pastoral farms.
- The Welsh Government should explore the principles of High Nature Value (HNV) farming, which would also contribute to the objectives of providing higher quality pollinator-friendly habitat.
- It is important to link up important habitats and also link up statutory and non-statutory sites. The Action Plan must also recognize that many designated sites are not in favourable condition and much work is needed to restore and protect these habitats through beneficial management.
- All Wildlife Trusts and some other environmental organisations already have projects, at different scales, from local projects to landscape scale partnerships. The Welsh Government should look to support this work and work in partnership with these organisations to create a **‘best practice for pollinators’** guide.
- Smallholder grants to help landowners who are not eligible for Glastir to manage orchards, Local Wildlife Sites and other important habitats.
- The actions needed to improve conditions in our urban and developed areas need careful consideration. This could include pollinator friendly bedding plants, flower-rich road side verges, and wildflower meadows in parks and using ‘amenity grassland’ to provide multifunctional benefits. The current situation with **excessive grass cutting** and the **use of bedding plants with no value to pollinators is not acceptable**. This includes swapping non-native daffodils for native Welsh daffodils that not only are beneficial to pollinators but also withstand the Welsh climate better than the tall, weak cultivars that collapse on themselves at the first sign of a breeze.
- An action plan should include
  - utilising their estate including putting in green roofs, green walls, bee hives, and ‘bee hotels’ on Government buildings
  - modifying estate management via planning native wildflowers (including native daffodils) and changing the mowing regime.
  - Enhance and/or create hedgerows and woodlands/tree belts on using native, pollinator friendly species.
  - Undertake pond construction on Welsh Government estate
  - The management of the Public Estate should aim to become pesticide free and encourage natural pest control by encouraging natural predators.
  - A deadwood strategy to retain standing deadwood or create areas of dead wood.

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

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.

**Dr. Mike Howe**

**4 June 2013**

Dr. Mike Howe

Ecolegydd Creaduriaid Di-asgwrncefn / Invertebrate Ecologist

Y Grwp Ecosystemau Daearol / Terrestrial Ecosystems Group

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Biodiversity Network  
North East Wales

Rhwydwaith Bioamrywiaeth  
Gogledd Dwyrain Cymru

## **North East Wales Biodiversity Network (Bionet) Response to the Draft Action Plan for Pollinators**

*This consultation response has been written by network partners: Denbighshire, Conwy and Flintshire County Council biodiversity staff, North Wales Wildlife Trust, Coed Cymru and Butterfly Conservation on behalf of the network, with endorsement from Denbighshire County Council's Biodiversity Champion Cllr Huw Jones:*

*“As Biodiversity Champion for Denbighshire County Council I fully support this consultation response from the North East Wales Biodiversity Network. I commend the Welsh Government for attempting to tackle this vital issue and hope that the outcome will be positive for our natural environment. I note the lack of clear guidance for Local Authorities on estates and road verge management and I strongly urge this to be addressed in the final Action Plan for Pollinators.”*

**Question 1: Do you agree with our vision for pollinators in Wales?**

Yes we agree with your vision for pollinators in Wales. We are particularly concerned with ensuring healthy wild pollinator populations and it is important the intrinsic value of the pollinating insects themselves isn't overlooked by focussing too much on what pollinators do for us / the services they provide.

**Question 2: Have we identified the main areas of concern for pollinators in Wales or are there further issues you want to identify?**

Yes you have highlighted the main areas of concern, with the omission of climate change which is not mentioned as an area of concern. Climate change needs to be considered as it is likely to affect populations and distribution of pollinators.

**Question 3: Do you agree with the outcomes identified, and the areas for action to achieve them? Your comments are welcomed.**

We feel strongly that what is proposed could go much further and the action plan in its current state will not be able to achieve the vision for pollinators in Wales. Comments on specific actions are below:

Area for Action 1: the document mentions on page 11 that Glastir currently covers 13% of agricultural land in Wales. The uptake of Glastir has been very poor so far – we have serious doubts that the current level of coverage will be sufficient to make a real difference given that agriculture is by far the biggest land use in Wales. Improving the uptake of Glastir is a priority not only for pollinators but for wildlife more generally, which may require Glastir measures and options to be revised.

Area for Action 2: mentions “We will work towards improving...the protection and management of habitats which benefit pollinators through Local Authority Biodiversity Champions.” Whilst we fully support and value the role of Biodiversity Champions, they are not supposed to be “experts” and may not be in place long enough to achieve continuity. We therefore question how they would achieve the aims of the pollinator plan. What support would be given – would you ultimately be relying on Local Authority Ecologists and Biodiversity Officers with finite resources? This also highlights the issue of resources – if existing Habitat Action Plans (e.g. grasslands, heathlands, woodlands) were adequately resourced then this would deliver huge benefits for pollinators. We would also welcome the role of Biodiversity Champions being better promoted within Local Authorities.

Area for Action 3: there is no mention of requiring Local Authorities to manage their estates, parks and public spaces in a pollinator-friendly way. This would be a huge missed opportunity, especially as it is a relatively easy measure to deliver since this is land that Local Authorities have full control over. It is vital

that Local Authorities follow the lead of the Welsh Government in incorporating pollinator-friendly policies across its administrative estate. A strong steer is needed from the Welsh Government on this. The current situation with excessive grass cutting and the use of bedding plants with no value to pollinators is not acceptable, and local authority biodiversity staff have in many cases not been able to make sufficient progress with their Parks / Public Realm departments. The promotion of the Natural Environment and Rural Communities Biodiversity Duty needs to be stronger from the Welsh Government – the importance of this needs to be impressed on Local Authorities, and the Welsh Government should expect better uptake of initiatives.

Community Initiatives: communities are often keen to plant wildflower seeds – it is important that native seed stocks are promoted, that their use does not compromise existing wildflowers and that existing guidance is promoted (e.g. Flora Locale website <http://www.floralocale.org/> Creating Habitat for Pollinators in Britain & Ireland Statement agreed by Plant Link UK and Invertebrate Link, 2011. In many instances a change in management can be a cheaper alternative.

Opportunities to promote planting for pollinators within Best Kept Community competitions should be increased. This is included on application forms and the scoring system in Flintshire but we would expect there to be a higher take up if it was a widespread initiative.

We are surprised at the omission of road verge management in the consultation document. Guidance for Local Authorities is sorely needed on the management of road verges for pollinators and other wildlife, without which wildflower-rich habitats will continue to be degraded and lost from road verges due to the continuation of inappropriate cutting regimes. Public opinion on this matter is also strongly in favour of managing road verges for pollinators by cutting later in the year once plants have flowered and set seed. A petition on [www.change.org](http://www.change.org) against Denbighshire Country Council's verge cutting regime has reached 379 signatures as of 4 June. The issue is at the forefront of people's minds, particularly in light of recent news on the plight of pollinating insects and the partial EU ban on neonicotinoids. The current approach of council biodiversity staff and Wildlife Trusts trying to persuade Highways departments to delay cutting of verges until after flowering (unless for safety reasons) has had only limited success in North East Wales. For example in Denbighshire policies for biodiversity-friendly verge cutting were introduced and a leaflet produced (attached), but were subsequently withdrawn by councillors, except for a limited area within the Clwydian Range and Dee Valley AONB. The production of clear guidance from Welsh Government directed at Highways departments and others who manage road verges is desperately needed. Our road verges include some of the last remnants of wildflower meadows in the UK (98% of which have been lost or degraded by some estimates<sup>1</sup>). It is vitally important that this habitat is protected.

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<sup>1</sup> PlantLife estimates that only 2% of the meadows and grasslands that existed in the 1930s remain ([http://www.plantlife.org.uk/campaigns/saving\\_our\\_magnificent\\_meadows/](http://www.plantlife.org.uk/campaigns/saving_our_magnificent_meadows/)).

Area for Action 4: it states that “we will monitor the situation with regard to the introduction of non-native bees for commercial pollination purposes”. We would urge the Welsh Government to put the long-term health of the wider environment first and oppose the introduction of non-native species. There are so many examples of species brought into countries for entirely honourable purposes which have since become problematic. The intensive rearing of non-native bees for commercial pollination also drastically increases the chances of diseases proliferating and being spread to wild native bees.

Area for Action 5: we note that you state that best practice guidance will be promoted to Local Authorities; however we feel that a stronger approach is needed. It is very easy in a time of staff losses and budgetary pressures for Local Authorities to ignore non-statutory work. It is vital that any guidance on pollinators doesn't get quietly ignored. The duty placed on Public Authorities by the NERC Act 2006 to preserve biodiversity is weak and already too often ignored and the Welsh Government should take steps to ensure that this situation does not continue.

**Question 4: How could you contribute further to the areas for action identified? How could we support you to do so?**

As a partnership of local conservation organisations we would be very keen, with the right support, to contribute to the pollinator action plan. We could feed into actions areas 2 and 3 through LBAP actions and partnership projects. Since our membership includes Local Authority ecologist and biodiversity officers we can help to implement best practice by Local Authorities, and also within the Clwydian Range and Dee Valley AONB. We can also contribute to action area 5 since awareness-raising is a big part of our remit through the LBAPs of Conwy, Denbighshire, Flintshire and Wrexham. The availability of good publicity materials would be of massive assistance in this.

There is growing concern about pollinators amongst the general public, and as a result mounting pressure on Local Authorities to carry out pollinator-friendly actions. We suggest in the light of this, that the time is ideal for the development and implementation of a 'Pollinator-friendly award scheme' for Local Authorities. This could be administered by WG or NRW (maybe along similar lines to the Green Flag scheme) and could give accreditations for certain actions, such as road verge management, management of parks/open spaces/school grounds, support for community action and policies regarding landscaping of new developments. We suggest that this would actively incentivise pollinator-friendly management within Local Authorities.

**Question 5: Would you like to be involved in developing the actions needed to achieve the outcomes? If so, in what way?**

Yes we have both technical and project management expertise which could help develop actions. Our network includes members of organisations already identified in your consultation document as having an interest, such as



Butterfly Conservation and North Wales Wildlife Trust. We would be particularly interested in identifying actions that we could then implement on a local level – especially in encouraging Local Authorities to do their bit.

**Question 6: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

Although clover is mentioned as a good pollen and nectar source for farm margins etc. bird's foot trefoil (*Lotus corniculatus* and *Lotus pedunculatus*) is not mentioned; we feel strongly that if this plant was more widely grown it would help not only wild bees but many species of Lepidoptera as well. Also, some commercial varieties of clover have flowers that are too large for bees to feed upon or pollinate (the flower tubes are too long for bees' tongues). Guidance on what varieties are useful to pollinators would be welcome for both land managers and seed distributors. The importance of trees as pollen and nectar sources is overlooked in the consultation document.

Potential conflicts surrounding invasive non-native species need to be considered, particularly Himalayan balsam, which is favoured by beekeepers but for biodiversity and other environmental reasons needs to be controlled.

The consultation document focuses primarily on bees, probably because we know most about them and their declines have been well documented. Whilst in many cases, actions that benefit bees will benefit other pollinating insects, this cannot be taken for granted. Just because other pollinators, such as hoverflies and moths, are less visible and less is known about them, this should not diminish their importance. Research to increase our knowledge about these species is vital if Wales is to provide a healthy environment to all pollinators.

Regarding the development of indicators, one for consideration could be the uptake by Local Authorities of initiatives. Strong pressure from Welsh Government on Local Authorities would increase uptake.

This is a fantastic opportunity to make a real difference for pollinators in Wales and lead the way for the UK, but the current document doesn't go far enough. We have to think bigger to make sure that we don't miss our chance in enhancing Wales' habitats for pollinators and boosting the populations of pollinating insects – as well as the other wildlife that relies on them.

### **Wales Pollinator Action Plan Consultation response**

**Organisation:** Wales Biodiversity Partnership Species Expert Group (SEG)\*

**Question 1: Do you agree with our vision for pollinators in Wales?**

The Welsh Government's commitment to producing a pollinator action plan is welcomed by the SEG, and we feel that it represents a starting point for action while noting that it should not detract from existing arrangements i.e. targeted species work,

Natura 2000 commitments, protected sites management, wider countryside management (SINCS, LNR's Green Space), NERC Duty arrangements and LBAP planning which will support wild pollinators. An accompanying action plan clearly setting out targets with an accompanying resource commitment is a clear priority. The SEG comments outlined here mainly relate to wild pollinators, the pollinator plan needs to ensure the actions for managed pollinators are complimentary and do not compromise wild pollinators.

**Question 2: Have we identified the main areas of concern for pollinators in Wales or are there further issues you want to identify?**

The main contributory factor in the decline of pollinators is habitat loss through agricultural intensification and land use change which will be exacerbated by climate change. We support the principle that “... *the emphasis for the Action Plan should be on providing better and more connected habitats which will support both wild and managed pollinators in farmland, the wider countryside, and in urban and developed areas*”. Again, clear actions setting out how this could be achieved are necessary.

**Question 3: Do you agree with the outcomes identified, and the areas for action to achieve them? Your comments are welcomed.**

Broadly yes with a stronger framing of the outcomes. An outcome focused towards diverse and connected pollinator habitats linking in with the wider landscape rather than ‘flowering habitats’ is advised (p.15).

**Comments on Specific Actions in the consultation document**

**Action 1: Farmland**

There needs to be a stronger wording under the CAP section (p.16), around integrating pollinator outcomes with proposed reforms to Pillar 1 and 2. CAP has the potential to drive biodiversity and ecosystem benefits including actions for pollinators but uptake of Glastir (& suitable options within Glastir) will be not be enough in its own right. For example, the Cambrian Mountain ESA had an excellent meadow and woodland scheme that was widely taken up and may be a suitable model to adopt.. Provisions for incentivising farmers and landowners in the wider environment will be required to deliver for pollinators including action for hedgerows and riparian zones in addition to grassland schemes. Schemes should include incentives for larger, joined up areas of diverse species composition, also ensuring provision of nectar sources over the whole of the flight periods of our wild pollinators, many of which have very extended spring and summer breeding seasons. Better agricultural management of margins, especially the use of fertilisers, could reduce nutrient input and enhance the provision of nectar sources available across the countryside. Hedgerow management regimes could also be manipulated to improve the availability of flowers both on the hedge species, but also along the hedge bottoms. Hedgerow renovation measures could also be supported and a review of hedge management, moving towards less frequent trimming/flailing to allow flowering of hedgerow shrubs and trees. Activities from poultry stock units also have an impact on eutrophication and further research is required to understand their impact and whether lessons can be learnt in terms of the spatial distribution of poultry units and minimising their overall impact.

Detailed research needs to be undertaken to establish the biodiversity and pollinator benefits of organic stock farming as some practices e.g flailing practices in organic

pastures can often result in the loss of pollinator plant and tree species which are eradicated before they can act as pollen and nectar sources.

### **Action 2: Wider countryside**

SEG welcomes the production of best practice guidance for pollinators to provide consistent advice and can assist in drafting the guidance. Whilst a mapping exercise for pollinators may be appealing in terms of the overall plan, SEG believes that concerted management action on the suite of designated and non-designated sites in Wales will provide benefits for pollinators (and wider biodiversity) and critically, protecting and creating habitat links between sites. Targeted species action may also be required for specific target species and SEG can highlight these. SEG is currently working with NRW/Welsh Government to develop Glastir species options which encompasses pollinator species and will continue in this role. SEG can offer an advice service to Welsh Government, NRW, Glastir contract managers and landowners with respect to wild pollinator species and their habitat requirements. Woodland management grants could be targeted to provide for permanent ride edges and a management plan that is of a scale to provide a continuity of clear-felled areas rich in flowers.

### **Actions 3: Urban areas**

SEG recognises a need to promote urban landscapes for pollinators to provide a year round source of forage and shelter. It will be vital to ensure the right advice with respect to planting and habitat management is given to the various groups including the use of native provenance species suited to the soil type and geographical area and appropriate planting regimes. SEG together with the WBP Urban Ecosystem group can provide advice in this respect. Road verge management schemes and supporting local authorities and Wildlife Trusts who have road verge schemes in places would be welcomed.

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

SEG supports the promotion of healthy populations of pollinators in Wales. There are some useful suggestions in the draft pollinator plan and the link with UK initiatives is desirable in conjunction with raising awareness activities in the RDP. Again, the actions need 'firming up' and shaped into targeted and measurable actions.

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

SEG welcomes awareness-raising of the importance of pollinators and engaging citizens in their management. Welsh Government needs to ensure plans for wild pollinators are congruent with managed pollinators. SEG notes the good work carried out by environmental NGO's including Bumblebee Conservation Trust, Buglife, Plantlife, Butterfly Conservation, local authorities and community groups in Wales. SEG encourages Welsh Government to support the efforts of all stakeholders involved in awareness-raising and pollinator management activities. Case studies are available to help in this respect. Bee friendly plants sold in nurseries and garden centres would benefit from an approved labelling scheme allowing customer's choice and information.

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

SEG supports the principle of integrated and coordinated action across Government departments. There are obvious links with the forthcoming legislative program- Environment Bill, Sustainable Development Bill and Planning Bill and we would encourage Welsh Government to engage with other portfolios to fully integrate the aims of the pollinator action plan. The proposed Biodiversity Strategy for Wales, with the right biodiversity outcomes will benefit wild pollinators but not to the detriment of existing habitats and species.

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

SEG supports the building of an evidence base to support future action for pollinators. Working with WBP Ecosystem and Species Expert groups and the WBP academics will be useful in this respect as will the knowledge of environmental NGO's, National Museum staff, recorder networks and local authority ecology staff.

**Question 4: How could you contribute further to the areas for action identified?**

**How could we support you to do so?**

The SEG represents a considerable body of expertise with respect to wild pollinator species (Hymenoptera, Coleoptera, Lepidoptera and Diptera), their life cycles and habitat requirements. In addition, SEG hold expertise on a comprehensive range of species, notably higher plants which in turn are reliant on a healthy pollinator population. SEG members also have expertise in integrating the needs of species with habitat requirements. The SEG is made up of a broad coalition of statutory and NGO sector organisations and can offer a comprehensive and informed view in shaping the pollinator plan and actions around the plan including monitoring. SEG has strong links with NRW and the Wales Biodiversity Partnership Ecosystem Groups and works with the WBP ecosystem groups to achieve common biodiversity aims.

**Question 5: Would you like to be involved in developing the actions needed to achieve the outcomes? If so, in what way?**

The SEG with its broad expertise would be happy to be involved in developing actions to achieve agreed actions.

**Question 6: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

SEG supports the principle of the action plan to support a healthy pollinator population in Wales. As noted in the response to question 1, the pollinator plan should not detract from existing arrangements and biodiversity commitments and should lead with a strong focus on securing 'providing better and more connected habitats' in Wales.



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**UNDEB AMAETHWYR CYMRU**  
**FARMERS' UNION OF WALES**  
**PRIF SWYDDFA \* HEAD OFFICE**

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*Ein Cyf/Our ref: AG/MIS/24*  
*Dyddiad/Date: 4<sup>th</sup> June 2013*

Dear Sir/Madam

**CONSULTATION ON THE DRAFT ACTION PLAN FOR POLLINATORS FOR WALES**

Thank you for inviting the Union's views on the Draft Action Plan for Pollinators in Wales.

Following an internal consultation with its membership, the Union submits the following views for your consideration.

The Union has long recognised the importance to the agricultural sector of both wild and managed pollinator populations and the role they undertake in pollinating crops and wild flora resulting in direct and indirect economic benefits as well as contributing to a diverse and attractive environment.

The Union also acknowledges that, as custodians of the countryside, the agricultural sector is one of the sectors which have a role to play in the provision and management of habitats which provide suitable environments in which pollinators can feed and nest.

Whilst the FUW agrees that, since the Second World War, agricultural practices have changed in order to bring about improved food security and to provide the necessary quantities of food to feed a growing world population, it is deeply concerned that in the Draft Action Plan for Pollinators, the Welsh Government has singled out agriculture and agricultural practices as the main cause of declining numbers of pollinators over the past thirty years. The Union believes that there are a range of factors, above and beyond agriculture and its practices, which have interacted to create the highlighted declines and have also impacted on the recovery of population numbers. These factors include the weather – especially the wet weather encountered during 2012 and this years' late spring – and disease in particular the *Varroa* mite. This is borne out by the Welsh Government's own Rapid Assessment of the Current Evidence Base of Pollinators, their Recent Decline and its Potential Impact which states that "disease has been highlighted as one of the main contributors to the decline in pollinator populations" and the consultation document which states that winter losses attributed to the *Varroa* mite are "higher than expected for the last two years".

It is also noted from the consultation that, under the main areas of concern outlined in the Introduction and in the detailed explanation provided under section 3 of the Draft Action Plan, the "importance of each of these [main areas of concern] and the extent to which they are inter-related is little known and is the subject of research initiatives". Therefore the Union contends that more evidence is needed on the relationship between the different factors affecting pollinator numbers prior to agriculture being cited as the main cause of the declines.

Without prejudice to the preceding comments, the Union's response to the questions highlighted in the consultation are given below.

### **Question 1**

#### **Do you agree with our vision for pollinators in Wales?**

Given its previously stated recognition of the important role pollinators have in pollinating agricultural crops and natural flora and the economic, social and environmental benefits this brings, the Union broadly agrees with the Welsh Government's vision for pollinators in Wales.

### **Question 2**

#### **Have we identified the main areas of concern for pollinators in Wales or are there further issues you want to identify?**

Whilst conceding that changing agricultural practices and intensification since the Second World War, when large tracts of land were brought into food production, may have been a contributory factor to the decline in pollinator numbers, the Union is deeply concerned over the prevalence given to agricultural practices as the main cause of the declines. The Union believes that until more research has been carried out on how the areas of concern outlined in the consultation interact and inter-relate to each other it is premature to cite one area of concern as the main cause.

The FUW notes that while diseases and viruses currently present in the UK are discussed in the Draft Action Plan, there is no mention of protecting against new diseases or virus threats which may be brought into, and subsequently infect, the UK pollinator population. This can be clearly observed when considering the *Varroa* mite when it was brought into the UK from the Far East in the early 1990's. The Union believes that stricter border controls should be put in place to prevent the import and the subsequent spread of new diseases and viruses. On this basis the reference in the fourth Area for Action to "monitoring the situation with regard to the introduction of non-native bees for commercial pollination purposes" should also be reviewed.

Agro-chemicals have an important role in controlling pests, diseases and weeds that impact on agricultural production, with the modern versions of these chemicals being more targeted towards specific pests, diseases or weeds. Farmers using these chemicals also undertake measures to reduce the impact on surrounding vegetation and wildlife via a range of methods such as spraying at night or co-ordinating with local beekeeping association spray liaison officers regarding when spraying activities are going to be carried out. The Union supports the sustainable use of agro-chemicals as a means of maintaining production while also limiting the negative impact of pests, diseases and weeds. The recent ban on neonicotinoids is a cause of concern to the agricultural sector and means that older less species specific pyrethroid chemicals, which have the potential to have wider ranging impacts including on pollinators, will be used in their place.

The FUW also believes that, in addition to climate change, consideration needs to be given to the weather conditions prevalent in Wales particularly the succession of poor summers and high levels of rainfall which have occurred in recent years and the impact this has had on the population numbers of managed and wild pollinators.

### **Question 3**

#### **Do you agree with the outcomes identified, and the areas for action to achieve them? Your comments are welcomed.**

Whilst broadly agreeing with the outcomes and areas for action outlined in the Draft Action Plan, the Union would highlight that under the first Area for Action, any arrangements or actions for pollinators should be included under Pillar 2 of the Rural Development Plan and not be part of Pillar 1.

The FUW also notes that the Glastir Scheme contains numerous options, at the Entry and Advanced levels, which can improve conditions for pollinators though the uptake of the options in the Entry level is reliant on farmers selecting these options as part of the application process. These options could be made more attractive to producers if the points and funding given to these options was increased.

In its response to the recently held consultation on the Next Steps for the Rural Development Plan 2014-2020, the Union supported the development of part farm agri-environment schemes which will allow for greater flexibility in meeting a range of objectives. These part farm schemes could be pollinator specific or, as part of a wider suite of actions, include interventions targeted towards pollinators.

During the Union's internal consultation with its members, it was suggested that, as part of the third Area for Action, the public sector, such as local authorities, could have a role to play in preserving habitats and flowering species suitable for pollinators on land within their ownership or under their control. This could be undertaken through the alteration of cutting dates or by leaving some areas of grassland, such as the edges of playing fields, uncut.

Given the Union's previously raised concerns regarding the need for greater research on the interactions between the various areas of concern outlined in the Action Plan and their contribution to the decline in pollinator numbers, the inclusion of Area for Action 7 – building an evidence base to support future action for pollinators – is welcomed. The FUW believes that the work on this Area for Action should be undertaken as a matter of urgency prior to the other actions being implemented to ensure that the agricultural sector is not unduly impact on.

#### **Question 4**

**How could you contribute further to the areas for action identified? How could we support you to do so?**

Farmers and landowners in Wales, via Glastir and the other legacy agri-environment schemes, already undertake a number of habitat management works and capital works, funded under Pillar 2 of the Rural Development Plan, which aim to directly or indirectly maintain and enhance pollinator numbers. The continued provision of these management and capital works options, along with the possible enhancement of the incentives to take up these options and the introduction of part farm schemes under the next Rural Development Plan, could contribute to the promotion of diverse and connected flowering habitats across farmland.

#### **Question 5**

**Would you like to be involved in developing the actions needed to achieve the outcomes?**

**If so, in what way?**

The Union, at a county and national level, is willing to work with the Welsh Government to develop the actions needed to increase the number of pollinators in Wales. As a member led organisation, the Union would welcome the opportunity to be involved at all levels in the development and implementation of the Action Plan.

In conclusion, the Union recognises the important contribution made by pollinators to agricultural production and therefore supports the Welsh Government's vision for pollinators in Wales. Farmers and landowners in Wales already undertake a number of actions to protect pollinators and provide them with suitable habitats either using their own initiatives or via management plans agreed as part of an agri-environment or similar scheme, therefore the unproven assertion throughout the Action Plan that agriculture is the main cause of the decline in population numbers is of significant concern to the Union.

I trust due regard will be given to the preceding comments.

Yours sincerely

**ANDREW GURNEY**  
Policy Officer (Land Use)

From: Frost, Peter [<mailto:Peter.Frost@cyfoethnaturiolcymru.gov.uk>]  
Sent: 05 June 2013 11:08  
To: BioDiversity  
Subject: Pollinator Action Plan - late response

Dear colleagues.

please accept my apologies for this late response, but in case there is still time to consider it, please see below for the comments from the Urban Ecosystem Group of the Wales Biodiversity Partnership. We have no objection to this response being made public.

Question 1: Do you agree with our vision for pollinators in Wales? We feel that the vision is broadly correct, and recognise that factors outside the Welsh Government's control such as climate change could render the vision unreachable. However, we would like to see the vision expressed more positively by re-wording it: "Wales supports healthy populations of wild and managed pollinators to benefit the people, economy and environment of Wales."

Question 2: Have we identified the main areas of concern for pollinators in Wales or are there further issues you want to identify?

We believe that the main areas of concern have been mentioned. However, we believe that urban areas, and post industrial sites have a greater part to play in providing suitable habitat and food for pollinators, but that these habitats are subject to pressures which could make them less suitable to pollinators in future.

Post industrial sites are still identified as key sites for development due to the often mistaken belief that they are worth less for biodiversity than farmland. In reality, such sites often contain the UK Biodiversity Action Plan priority habitat Open Mosaic Habitats on Previously Developed Land (OMHoPDL) which provide large areas of habitat for pollinators such as *Bombus sylvarum*. Proper survey of these sites and safeguarding of key examples will help to protect pollinators. Action needs to be taken by local authorities to either conduct surveys, or require landowners to conduct surveys to ascertain the conservation importance of such potential OMHoPDL before development is permitted. Natural Resources Wales and the Welsh Government have roles to play in funding such surveys and in reminding local authorities that conducting such surveys will enable them to deliver their biodiversity duty under S.40 of the 2006 NERC Act.

The Biodiversity in Urban Gardens (BUGS) I and II projects provided scientific evidence that urban gardens provide a significant resource for biodiversity, including many pollinators. It appears that the diversity of private gardens provides a mosaic of habitats which fosters biodiversity. However, subsequent work in places such as London has shown how gardens are under threat from being developed upon and decked-over, and that front gardens in particular are threatened with paving-over for off-street parking. The Welsh



Government should strongly consider using the planning system to further control the extent to which gardens may be paved or decked, and the extent to which gardens are allowed to be developed upon. This will have the added benefit of safeguarding permeable surfaces in urban areas which may act to control flooding.

Question 3: Do you agree with the outcomes identified, and the areas for action to achieve them? Your comments are welcomed.

The action plan has identified many useful areas of action but it could still go further.

The curtilage of industrial and institutional developments is a potentially under-utilised resource, much of which is kept as short grass which is of little use for pollinators. The Welsh Government could emulate the Libraries and Modern Meadows project undertaken by the North Wales Libraries Partnership and set an example by managing its own estate to create more diverse swards for the benefit of pollinators and other wildlife. CCW and now Natural Resources Wales has shown that it is possible to encourage more wild flowers by simply relaxing the mowing regime on parts of its Maes y Ffynnon site, and the North Wales Police Authority maintains a large wildflower meadow at its Colwyn Bay headquarters. The Welsh Government should strongly consider mandating all the bodies for which it is responsible to implement similar practices.

The Welsh Government should strongly consider advocating these practices to the private sector, and mandating such practices for all publicly-funded bodies in Wales, unless they can be definitively shown to seriously compromise the delivery of the statutory duties of those bodies. Swathes of daffodils on roadsides and in municipal grassland have been a common sight in Wales for decades, and "wildflower verges" are becoming increasingly common too; demonstrating that the management of swards for species other than grass is well within the abilities of all institutional landowners. Changes in mowing regimes can often lead to cost savings as long as there is access to the required machinery. This is a clear area where both wildlife and budgets benefit and there can be little excuse for the appropriate practice not being adopted across the nation.

The Plant for Wildlife campaign of the former CCW was well received as a means to encourage gardeners to provide for biodiversity in their own backyards. We would like to see similar efforts made to promote to gardeners the evidence-based actions now being advocated by organisations such as the RHS, The UK Wildlife Gardening Forum and DEFRA which will make gardens better places for people and nature. This might include bringing Plant for Wildlife up to date and re-launching it, as well as extending initiatives such as the North Wales Wildlife Gardening Project to the whole of Wales in collaboration with the Welsh Wildlife Trusts.

Question 4: How could you contribute further to the areas for action identified? How could we support you to do so?

The Urban Ecosystem Group of the Wales Biodiversity Partnership would welcome the chance to share its knowledge of habitat management for pollinators in the urban environment. In particular we would like to encourage Local Biodiversity Partnerships and their members to identify and survey OMHoPDL, and then to manage the best examples for the benefit of biodiversity in general, and pollinators in

particular. In order to do this we would require funding to be made available for habitat surveys, training for surveyors, and funds for practical work on-site.

Question 5: Would you like to be involved in developing the actions needed to achieve the outcomes? If so, in what way?

The Wales Urban Ecosystem Group would welcome the chance to be involved in developing the actions in this plan through further consultation. In addition to the actions identified in our response above, we can reach out to Local Biodiversity Action Partnerships across Wales, and to our own member organisations to gather information and evidence, and to disseminate advice.

Question 6: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them: Many garden plants are advocated as "pollinator-friendly" (e.g. *Cotoneaster horizontalis*) but have undesirable characteristics such as the ability to spread beyond the garden and become invasive in natural habitats to the detriment of their ability to support biodiversity. We would therefore strongly suggest that, as part of this initiative, or as a separate project the Welsh Government conducts or supports research to provide evidence to the horticultural trade and UK legislators to help ensure that trade in potentially invasive or disease-carrying plants is ended.

Please do not hesitate to contact me should you require further clarification or expansion of any of the responses given above. Please note that this response is from the Urban Ecosystem Group of the Wales Biodiversity Partnership and does not represent the opinion or thinking of Natural Resources Wales - who have submitted their own response.

Yours sincerely

Pete Frost

Chair, Urban Ecosystem Group

C/O

Cyfoeth Naturiol Cymru / Natural Resources Wales

[www.cyfoethnaturiolcymru.gov.uk](http://www.cyfoethnaturiolcymru.gov.uk) / [www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

## **A Formal Response from Garden Organic the National Charity for Organic Horticulture in the UK.**

### **Question 1: Do you agree with our vision for pollinators in Wales?**

*Garden Organic has been lobbying for a National Plan so therefore welcomes the Welsh Government setting such an important example by introducing an Action Plan for Pollinators, it is an example which needs to be followed by the rest of the UK.*

### **Question 2: Have we identified the main areas of concern for pollinators in Wales or are there further issues you want to identify?**

*The influence on the horticultural industry and garden centres to promote pollinator friendly products and inform and educate the public about alternatives to the use of pesticides and the promotion of sustainable organic alternatives.*

*In addition to safeguarding spaces as outlined in Area 1 could that be extended to explore Experimental methods in sheep farming and stocking densities which encourage floral diversity in the welsh countryside. This could also be linked to Action 7.*

### **Question 3: Do you agree with the outcomes identified, and the areas for action to achieve them? Your comments are welcomed.**

*The Outcomes should include:*

*Educating farmers, food producers, horticulturalists, gardeners etc about the availability of alternative methods and products and services which are more pollinator friendly and for the industry to provide choice so that people can change behaviours and adopt more sustainable methods.*

### **Question 4: How could you contribute further to the areas for action identified? How could we support you to do so?**

*See the items listed below to demonstrate how this could be done on a national scale, obviously these are actions which would need to be resourced either through grant, levies or through partnerships with commercial sponsors or a combination thereof.*

### **Question 5: Would you like to be involved in developing the actions needed to achieve the outcomes? If so, in what way?**

*Garden Organic and Coventry University manage the Centre for Agro-ecology & Food security and as part of this work it is involving gardeners, allotment growers, small holders and market gardeners in a major bumble bee survey for vegetable growing areas and assessing the effectiveness of different approaches to supporting bee populations through specific planting arrangements or the use of propriety or improvised bee homes and nesting facilities etc. This is a piece of work which could be readily expanded across Wales to gain a better picture of Welsh Bee populations whilst also raising public awareness of positive actions for bees. [Area Action 7]*

*Garden Organic is also working with the Horticultural Trades Association (HTA), the Garden Industries Manufacturers Association (GIMA) and the Garden Centre Association*

*(GCA) on the development of a Greening Garden Centres initiative across the UK where there are specific categories of areas for action for sustainability which will be independently assessed by Garden Organic with specific awards attributed to each category. One of these categories is pollinating insects.*

*Garden Organic's Master Gardener Programme is a network of highly trained mentors encouraging gardening and food growing across a diverse range of community settings from prisons to housing estates to local parks where local people are being engaged and supported in gardening. The Charity's work on bees is incorporated in this along with advice. We are also building links to the Natural Beekeepers Association and the British Beekeepers Association local groups.*

*The Growing Food in Schools programme involving 5,000 schools in the UK linking in food growing with the national curriculum across the whole spectrum of subject areas including design technology and science incorporates awareness of pollinators etc. Some schools also keep bees in their grounds.*

**Question 6: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

*Having attended the Welsh Food Summit last year it would be useful for the Food Strategy to incorporate this issue within it and to incorporate how local beekeepers and co-operatives can be supported and developed to promote quality Welsh Honey using pollinator friendly approaches and organic farmland designated areas. The challenge of how can one ensure organic honey is available and having some clarity of definition.*

Bret Willers BSc (Jt hons), C.Biol, M.Inst.Env.Sci, FRES  
Development Director,  
Garden Organic (formerly the Henry Doubleday Research Association)  
Ryton Gardens  
COVENTRY  
CV8 3LG

Maerdy  
Corwen  
24.05.13

Dear Alun Davies,

I have lived at the above address for nearly 28 yrs, and during that time I have watched farmers slowly destroy the countryside:-

- The ploughing of old upland pasture to be reseeded with rye grass.
- The use of roundup to destroy all flora in a field to be then reseeded with a mono grass.
- The selective spraying with herbicides to kill everything but grass
- The repeated ploughing of fields for the planting of kale, turnips or rye grass.
- The spreading of manure 4 to 5 times per year in addition to the use of nitrogen potassium phosphorus fertilizers
- The constant over grazing of pasture by too many sheep
- The drainage of bogs and wet areas in fields,
- The slashing of hedges around fields to keep them low and narrow.
- The complete lack of natural borders around fields.

The result of these practices is a complete lack of flowers.

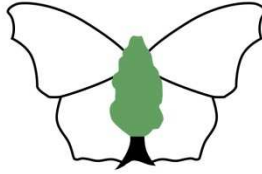
The use of roundup – which is not bio-degradable as proven in the French courts in 2007 & 2009, kills soils fauna and affects the reproductive cycles of frogs and other aquatics.

On page 2 you say food and shelter for pollinators can also be provided in gardens, parks, road verges and any other open spaces. I am curious as to how you are going to persuade Highways, Parks and Garden and Public Realm to change what they do at present, and how you are going to fund them.

Yours Sincerely,

Molly Lear





**Butterfly Conservation Wales**  
**Gwarchod Glöynnod Byw Cymru**

**Butterfly Conservation Wales response to the Draft Action Plan for Pollinators**

**May 2013**

Butterfly Conservation Wales is part of the UK charity Butterfly Conservation, whose aim is the conservation of butterflies, moths and our environment. Most of our work takes place within the UK but we work across Europe as a partner in Butterfly Conservation Europe, which we helped establish in 2004.

Butterfly Conservation Wales has been working in partnership with the Welsh Government, Natural Resources Wales and its predecessor bodies and a wide range of other partners for over a decade to help halt the loss of biodiversity. We are 'Lead Partner' for the majority of butterflies and moths (Lepidoptera) identified as priorities on the Section 42 list (currently over 110 species). We compile and manage some of the largest databases on butterfly and moth distribution and trends available anywhere in the world. Our datasets on these groups are the largest available on the NBN Gateway at over 14 million records.

Butterfly Conservation Wales is an active member of Wales Environment Link (WEL)

**Question 1: Do you agree with our vision for pollinators in Wales?**

Butterfly Conservation is keen to encourage Welsh Government to commit to actions for declining invertebrates. However, we are disappointed that the stated vision lacks clarity and an 'outcome' cannot be realised until necessary actions are achieved.

For Wales to have 'healthy populations of wild and managed pollinators' requires better defined actions with clear targets, budgeted and measurable outcomes and realistic mechanisms for delivery. Efforts to tackle wild pollinator declines are best achieved if they form part of an integrated approach to stemming biodiversity declines and delivery of an Ecosystem Approach.

**Question 2: Have we identified the main areas of concern for pollinators in Wales or are there further issues you want to identify?**

Issues around habitat quality and connectivity have been rightly identified in the document and apply to wild pollinators and honeybees. However, many of the issues for wild pollinators would fit better as part of concerted actions to stem biodiversity declines. For instance Lepidoptera require larval resources and over-wintering sites as well as nectar /pollen and other wild pollinators provide alternative ecosystem services e.g. hoverfly larvae eating aphids (pest control).

**Question 3: Do you agree with the outcomes identified, and the areas for action to achieve them? Your comments are welcomed.**

There is a mismatch between the 'Outcomes' and the vagueness of many of the 'Actions'. We feel that many of the actions are too woolly or aspirational, rather than clear and deliverable, to identify what meaningful change they would achieve.

### **Area for Actions 1 -3**

The lack of flowering plants throughout the year is a limiting factor on the number of insects available for pollination and more options (other than just clover leys) need to be available within Glastir that encourage:

- Sympathetic management of existing flower-rich areas on farmland and open space in woodland. This means leaving some areas ungrazed/un-cut at different times of the year.
- Opportunities to connect-up these existing areas with new planting from native seed sources such as green hay.

Mapping is a process not an action. Much of this work for woodlands, grasslands and heathlands has already been done and now needs clear actions on how it is to be implemented<sup>1</sup>.

There is mention of pollinator friendly policies being implemented. Some case studies would help to illustrate the action plan.

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

This includes a concrete action to continue to implement the Healthy Bees Plan. The rest of the 'actions' are rather vague.

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

We welcome the principle of linking together Welsh Government policies to deliver wider ecosystem health. However, the 'actions' are too vague to know what they will deliver.

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

Building the evidence base is important. However, with so many vague actions monitoring the outcomes to help inform future action will be a very difficult task. The actions must become more specific and measureable (SMART).

Butterfly Conservation Wales is able to offer its expertise in monitoring and recording of butterflies and moths once actions are identified.

### **Question 4: How could you contribute further to the areas for action identified? How could we support you to do so?**

Butterfly Conservation Wales has already contributed at short notice to initial discussions on the Action Plan. We have monitoring schemes, such as the UK Butterfly Monitoring Scheme,

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<sup>1</sup> Ecological Connectivity and Biodiversity Prioritisation in the Terrestrial Environment of Wales, J. Latham, J. Sherry & J. Rothwell, 2013. CCW Staff Science Report No. 13/3/3



that can provide a means of monitoring impact on one group of wild pollinators. We could also provide more advice to public and private landowners with adequate support.

**Question 5: Would you like to be involved in developing the actions needed to achieve the outcomes? If so, in what way?**

We would welcome involvement in developing actions that focus on reversing biodiversity declines in general rather than wild pollinators in particular. Many of the projects we have run over the last ten years have focussed on delivering biodiversity recovery at a landscape scale<sup>2</sup>.

**Question 6: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

**Other comments**

What are Pollinators (p.1)

- There is insufficient evidence to determine the relative importance of different pollinator groups as pollinators of food crops or wild plants.

What Pollinators Need (p.2)

- There is no mention about habitat connectivity even though connectivity is discussed later. This is a serious omission as this section establishes the context for the action plan.
- Wild pollinators need more than just 'nectar sources and nesting sites' – Lepidoptera require over-wintering sites and larval resources as well.
- Why is Greater Knapweed selected as an example rather than Common Knapweed which is widespread and not confined to calcareous grassland?

The Action plan (p.3)

- An Ecosystem Approach requires all areas that need intervention to be identified, not just those Welsh Government thinks it can implement with no additional resource. The scope of what the Action Plan can achieve is therefore limited from the start.
- We would like to see the long list of options generated through consultation with stakeholders to compare against the options selected by Government. We would also like to know why Welsh Government chose the actions it did.

We feel the focus on pollinator declines rather than wider biodiversity declines is a missed opportunity and does not demonstrate the Ecosystem Approach the Welsh Government is attempting to promote. Many groups of invertebrates provide ecosystem services e.g. in nutrient cycling or pest regulation either because of their life strategies e.g. Dung Beetles or at different stages of their life cycles e.g. hoverfly larvae eating aphids.

It will be impossible for Welsh Government to deal with all these declining invertebrates piecemeal, as it appears to be doing for pollinators without a comprehensive and deliverable biodiversity strategy.

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<sup>2</sup> Ellis, S., Bourn, N.A.D. and Bulman, C.R. (2012) Landscape-scale conservation for butterflies and moths: lessons from the UK. Butterfly Conservation, Wareham, Dorset.

June 3 2013

**Welsh Govt Draft Action Plan for Pollinators  
Monmouthshire Rural Development Plan (RDP) Local Action Group  
Response to Consultation**

|                               |  |
|-------------------------------|--|
| <b>Name</b>                   | <b>Alan Michie, Chair</b>  |
| <b>Organisation</b>           | <b>Monmouthshire Rural Development Plan (RDP) Local Action Group</b>               |
| <b>Email/telephone number</b> | <a href="mailto:alananne.michie@btinternet.com">alananne.michie@btinternet.com</a> |

Monmouthshire RDP organised a meeting of stakeholders in Monmouth on May 28 2013. Our responses given here reflect the views expressed at the meeting. Stakeholders included representatives of Monmouthshire County Council, beekeepers, farmers, ecologists and Bees *for* Development.

**1. Do you agree with our vision for pollinators in Wales?**

Yes

**2. Have we identified the main areas of concern for pollinators in Wales or are there further issues you want to identify?**

Habitat degradation and use of agrochemicals are the most important issues.

Honey bee disease is the least important issue. Restricting bee imports would address the disease issue.

**3. Do you agree with the outcomes identified, and the areas for action to achieve them? Your comments are welcome.**

Yes, except we suggest changing the priority, which we propose should be:

1. Habitat and monocultures
2. Agro-chemical use
3. Climate change
4. Exotic diseases and predators in honey bee (and potentially other bee species) populations

**5. How could you contribute further to the areas for action identified? How could we support you to do so?**

- The Monmouth-based organisation Bees *for* Development would be keen to contribute to a Centre of Excellence for Wales.

- Monmouthshire would like to promote a Bee/Pollinator Week and to encourage greater awareness of the need to plant bee-friendly plants etc.
- Monmouthshire Council last year supported a Monmouthshire Bee Festival and may be willing to do so again.
- Support habitats and corridors with bee-friendly plants.
- Educate people that not all plants are useful to bees (e.g. exotic varieties).
- Could Welsh Government adopt a policy of planting predominately bee-friendly plants?
- More open and free discussion of differing methodologies.
- Interested in developing a Welsh Centre of Excellence.
- Develop the concept of "Bee Friendly Monmouthshire".

**6. Would you like to be involved in developing the actions needed to achieve the outcomes? If so, in what way?**

- Monmouth-based Bees *for* Development would like to contribute. The RDP would also be keen, dependent on funding.
- Could engage public in undertaking "citizen science" surveys of pollinator populations - could be part of the proposed Pollinator Week.
- Discussion of a second Monmouthshire Bee Festival.
- Marc Carlton requests that this should be named Monmouthshire Pollinator Festival.

**7. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.**

As above.

|  |    |
|--|----|
| Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential, please tick here: | OK |
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## **WEL response to the Draft Action Plan for Pollinators**

**June 2013**

**Wales Environment Link (WEL)** is a network of environmental and countryside Non-Governmental Organisations in Wales, most of whom have an all-Wales remit. WEL is officially designated the intermediary body between the government and the environmental NGO (eNGO) sector in Wales. Its vision is to increase the effectiveness of the environmental sector in its ability to protect and improve the environment through facilitating and articulating the voice of the sector.

Wales Environment Link values the opportunity to take part in this important consultation.

### **Question 1: Do you agree with our vision for pollinators in Wales?**

We agree that there needs to be an overall vision to improve conditions in order to support healthy pollinator populations. However, the stated vision lacks clarity and contrary to the statement in the consultation document, it is not an “outcome” (p.5). The vision would only become such when associated actions have been achieved. In this case the outcome would be that ‘Wales has healthy populations of wild and managed pollinators...’ This needs to contain a clear definition of what ‘healthy’ means particularly with reference to increasing populations of widespread and scarce wild pollinators and a sustainable honeybee industry.

A barrier to achieving this outcome is that the draft ‘Action Plan’ lacks well-defined actions. This needs to be urgently addressed by Welsh Government, and the final action plan needs to contain greater detail with defined targets, budgeted and measurable outcomes and realistic mechanisms for delivery. It is also important to stress that efforts to tackle the important issue of pollinator decline should form part of an integrated approach to enhancing biodiversity and promoting a more robust and resilient environment.

### **Question 2: Have we identified the main areas of concern for pollinators in Wales or are there further issues you want to identify?**

The five main areas of concern go some way to identifying the major threats, and we are pleased to see an emphasis in the action plan on increasing the provision of high quality and better connected habitats to support wild and managed pollinator

populations. WEL has identified some further issues, which we believe need to be considered:

- Agro-chemicals: the policy to reduce usage of pesticides and fertilisers to the lowest possible level is to be commended, however we would question how Welsh Government intends to implement this policy. There is intransigence to limiting the use of avermectins, which impact on other important groups of invertebrates that provide nutrient recycling services. It should also be noted that since the release of the Draft Action Plan consultation the EU has placed a temporary ban on neonicotinoid pesticides in Europe.
- Climate Change: we do not know what the likely impacts will be but these may include increases in pathogens of honeybees, break down in synchronicity between flowering plants and pollinator emergence.
- Competition for resources: the potential impact of kept honeybees on native bumblebee populations must be considered. An increase in competition for resources may arise in areas where there are a higher number of apiaries, which affect wild pollinators<sup>1</sup>.
- The Action Plan must consider threats to all pollinator species, not just bees and it is important to distinguish between native and kept honeybees as there are substantial differences in their ecology.

**Question 3: Do you agree with the outcomes identified, and the areas for action to achieve them? Your comments are welcomed.**

**Outcomes:** There is a mismatch between the 'Outcomes' and the vagueness of many of the 'Actions', many of which are unspecific and aspirational rather than clear and deliverable.

#### **Area for Action 1 (farmland)**

The absence of flowers throughout the landscape is a major factor limiting the number of insects available for the pollination of wild flowers and agricultural crops. To combat the habitat loss and associated wild and managed pollinator declines we have experienced as a result of agricultural intensification and land use change, substantial areas of land will need to be managed in a completely different way. It is essential that Welsh Government takes this opportunity to address pollinator declines in the agricultural landscape by making sure that subsidy schemes are working towards positive environmental outcomes.

As a mechanism for delivery Glastir has a range of limitations. To be eligible for the scheme land needs to be considered Utilisable Agricultural Area registered under IACS. Entry is voluntary, which further limits the land to which agri-environment measures could be applied. In addition, entry to the scheme does not necessarily mean that farms are undertaking measures that will enhance habitat for pollinators, as Glastir Entry is not focused enough to target measures in the most appropriate places for pollinators. Glastir Advanced is far more targeted and includes better targeted management to improve pollinator floral resources, however application to this higher scheme is selective and farmland may not reach the score threshold for acceptance to the scheme. Thus, although there is distinct potential for Glastir to help deliver considerable benefits for pollinators, it is likely that major changes to the prescriptions would be needed to facilitate this.

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<sup>1</sup> Terrestrial Biodiversity Climate Change Impacts Report Card, 2012-13

The increased use of clover-leys would do much to improve habitats for bees, however it should be noted that this is unlikely to do much for many other pollinators. In addition, the clover leys should not be cut for silage until after the clover has flowered and, depending on the agricultural variety of clover used, the ley may need to be re-sown to maintain the floral resources if the arable rotation has a ley period greater than three years. Whilst the land is under arable cultivation, an alternative that will benefit all the local pollinators in an area would be supporting the fallow margins option, which will allow annual wild plants to develop and thus work in combination with the clover in grass leys.

Many of the arable areas are also target areas for bumblebees so there is conflict between wild and managed populations in terms of competition for resources and possibility of disease transfer. Glastir options and the pollinator action plan also have a tendency to focus on bees rather than being inclusive of all pollinators which require a wider range of floral resources, for example hoverflies are known to feed on members of the daisy family.

It is also important that the positive contribution of hedgerows, scrub, trees and field boundaries for pollinators is acknowledged. Although it is right that emphasis is placed on protection, creation and connectivity of grassland habitats for pollinators, the Action Plan should also encourage sensitive planting of suitable hedges and trees on farmland. It should also include scrub as an in-field habitat and earth/ stone banks and walls. These actions can provide valuable shelter for flying insects as well as additional sources of nectar and pollen, particularly early in the year when other floral resources are scarce.

Ensuring that the woodland creation option is integrated with primary 'pollinator-friendly' options (such as maintaining/ restoring existing flower-rich habitats, allowing field strips and corners to remain uncut/ grazed and maintaining glades and rides within planting areas) would help to create a holistic suite of measures to improve conditions for pollinators. This requires more flexibility in the application of planting design rules under Glastir woodland creation and recognition that all woodland creation can and should include some creation of open habitats.

We would also urge Welsh Government to explore the principles of High Nature Value (HNV) farming, which would also contribute to the objectives of providing higher quality pollinator-friendly habitat under all three types; 1) extensively managed semi-natural habitat, 2) farmland features and 3) priority species.

The consultation document mentions the benefits of organic farming to pollinators. Although many of the principles behind organic farming are to be commended, we are unclear exactly how they would be of direct benefit to pollinators and it is important to note that organic farms can be as intensive as non-organic systems and particularly thorough in keeping down all plant growth on un-cropped land.

### **Area for Action 2 (wider countryside)**

WEL supports the need for a network of diverse and connected flower-rich habitats across Wales and believes that a key part of this is to link up statutory and non-statutory sites and improve connectivity between habitats. The Action Plan must also recognise that many sites are not in favourable condition and much work is needed to restore and protect these habitats through beneficial management.

We would argue that mapping is a process rather than a strategic action, and would stress that much of this work for grasslands and heathlands has already been done through CCW/NRW connectivity mapping programme<sup>2</sup>. Welsh Government must utilise this evidence base effectively; despite the fact that good data exist for important pollinator habitats we continue to lose these sites.

Many environmental NGOs have projects in conjunction with local authorities and others organisation, and could use this expertise to work together and compile a 'best practice for pollinators' guide. Local authorities, Welsh Government and other organisations could then use this guidance in their management of road verges, parks, woodland rides, industrial estates etc.

We would caution including actions for pollinators as a cross cutting theme for all biodiversity funding as these specific objectives may not always be appropriate, e.g. marine projects.

### **Area for Action 3 (towns, cities and developed areas)**

It is an important objective to promote flowering habitats and landscapes of benefit to pollinators in our towns, cities and developed areas. The actions needed to improve conditions in our urban and developed areas need careful consideration, however. Parks, green spaces and allotments may not necessarily provide for pollinators, and careful management and consideration of planting and ensuring a continuity of a range of flowering plants, shrubs and trees throughout the year is required in order to do so.

Developing comprehensive and measureable road verge management schemes should be a clearly defined action. This will require working closely with and supporting local authorities to help them change their practices – e.g. adjustments to contracts with external contractors, collection of grass cuttings to prevent nutrient rich soil conditions developing on verges etc. Detailed case study examples from local authorities where a change in management has been successful would be extremely helpful as a good practice guide. It should be noted that adjusting mowing regimes may also require additional litter picking and information to win over the public and address any concerns over road safety. The stated intention by Welsh Government to "...continue to incorporate pollinator friendly policies across our administrative estate..." would be reinforced by the inclusion of examples or case studies where this has been done successfully.

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

We support the inclusion of a concrete action to continue to implement the Healthy Bees Plan, however, the remainder of the 'actions' are rather vague and we would expect the final action plan to contain more targeted and measurable actions.

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

It is important that Welsh Government has recognised the need to raise awareness of pollinators amongst the public, landowners, schools, businesses and local authorities. The eNGO sector, along with local authorities and statutory bodies, has a wealth of experience and material available for engaging with these groups. We would

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<sup>2</sup> Ecological Connectivity and Biodiversity Prioritisation in the Terrestrial Environment of Wales, J. Latham, J. Sherry & J. Rothwell, 2013. CCW Staff Science Report No. 13/3/3

encourage Welsh Government to further its commitments in helping stakeholders continue this work.

With reference to Natural Resources Wales's 'plant for wildlife' work, the impact of invasive alien species should be considered, e.g. Himalayan Balsam, as there is a large potential conflict between the requirements of wild and commercial pollinators.

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

The principle of linking together Welsh Government policies to ensure a joined up approach that is beneficial for wider ecosystem health is absolutely crucial. However, it is unclear from the points in the consultation document how Welsh Government are going to do this – the 'actions' are too vague to know what they will deliver. It is also vital that the biodiversity strategy to be developed and implemented by Welsh Government does not and should not focus on any one group in particular, such as pollinators, as it needs to consider biodiversity in the round.

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

Building the evidence base is important however, with so many vague actions monitoring the outcomes to help support future action will be a very difficult task. The actions must become more specific and measureable (SMART).

**Question 4: How could you contribute further to the areas for action identified? How could we support you to do so?**

Environmental NGOs (eNGOs) such as the members of WEL can support the further development of clear and deliverable actions as well as provide advice and services to monitor outcomes.

**Question 5: Would you like to be involved in developing the actions needed to achieve the outcomes? If so, in what way?**

It is likely that a number of environmental NGOs within WEL's membership would be happy to be involved in developing actions needed to achieve outcomes. As an umbrella organisation designed to bring these organisations together, WEL could help to disseminate information and co-ordinate engagement.

**Question 6: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

WEL broadly supports the principle of an Action Plan that aims to improve conditions to support healthy populations of pollinators in Wales. However, we are disappointed that this plan is being developed separately to a wider biodiversity strategy for Wales.

A holistic biodiversity strategy would have incorporated the enhancement of pollinator populations as an objective with outcomes achieved through the implementation of measures designed to improve, increase and connect/ buffer habitats for the benefit of a diversity of wildlife. Indeed, if we had a comprehensive biodiversity strategy in place with associated delivery mechanisms and regulation aligned with its objectives, a specific Pollinator's Action Plan may well be unnecessary. In addition, a



comprehensive biodiversity strategy would demonstrate the Ecosystem Approach, which Welsh Government is so keen to promote.

In the absence of a biodiversity strategy however, the Action Plan for Pollinators undoubtedly has the potential to realise positive environmental outcomes. That said, it should avoid focusing on narrow, targeted measures designed to benefit a small number of pollinators, and should instead aim to lead to Wales-wide enhancements of natural habitats for the benefit of biodiversity including pollinators.

This draft document is itself more of a strategy than an Action Plan, and lacks defined measurable actions. The final Action Plan needs SMART actions and achievable targets and outcomes, along with some substance to monitor actions and result indicators to measure progress. We believe that to have maximum effect the Action Plan should be developed with stakeholders via a Task and Finish group.

Welsh Government also needs to ensure wide-spread engagement and co-operation by a range of stakeholders in order for the actions to be successfully implemented. To make this possible we would recommend the following steps:

- Local Authorities and Highways Dept to adopt and implement a Road Verge Policy – based on Welsh Government (and eNGOs) template. Adoption and implementation of this policy would be a condition of the Welsh Government Local Authority or Departmental Grant.
- All Public Bodies and Government Departments to adopt and implement a wildflower and pollinator Action Plan – based on a Welsh Government (and eNGOs) template. Adoption and implementation of this policy would be a condition of the Welsh Government Local Authority or Departmental Grant.
- Welsh Government should take advantage of the expertise within the eNGO community in relation to giving advice to landowners – this could be achieved by using RDP money to mainstream the provision of agri-environment advice into eNGOs.

We also would like to draw attention to range of inaccuracies and omissions in the introductory passages describing pollinators in this consultation (p.1-2), which should be addressed in future drafts of this plan.

- We do not believe there is sufficient evidence to determine the relative importance of different pollinator groups as pollinators of food crops or wild plants.
- Wild pollinators need more than just ‘nectar sources and nesting sites’ – Lepidoptera require over-wintering sites and larval resources as well.
- Pollinators also contribute to ecosystem function as they are part of food chains e.g. moth larvae for birds.
- There is no mention of pollen at all as the only source of amino acids for bees, which have been found to prefer certain plants, e.g. blackberry. Some flowers only produce pollen and no nectar but are a major resource, e.g. cornflower.
- It is strange that greater knapweed has been selected as an example rather than the more common knapweed which is not confined to calcareous grassland.
- Habitat connectivity is a crucial element of the plan and although it is discussed later in the document, its omission from the introductory section is disappointing as this section establishes the context for the action plan as a whole.

**The following WEL members support this document:**

**Amphibian and Reptile Conservation (ARC) Trust**

**Buglife – the Invertebrate Conservation Trust**

**Butterfly Conservation Wales**

**Coed Cadw / Woodland Trust**

**Cymdeithas Eryri / Snowdonia Society**

**Plantlife Cymru**

**RSPB Cymru**

**Wildlife Trusts Wales**

**Ymddiriedolaeth Genedlaethol / National Trust**

Biodiversity team  
Nature, landscape and outdoor recreation branch  
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4th June 2013

Dear Sir/Madam

#### DRAFT ACTION PLAN FOR POLLINATORS

Thank you for consulting Wildlife Trusts Wales (WTW) on the above document.

Wildlife Trusts Wales (WTW) is the umbrella organisation for the six Wildlife Trusts in Wales – Brecknock, Gwent, Montgomeryshire, North Wales, Radnorshire and South and West Wales (hereafter referred to as the 'Wildlife Trusts') working together in partnership to achieve a common aim. The Wildlife Trusts collectively speak on behalf of more than 28,000 members and manage over 200 nature reserves, covering more than 6,000 hectares of prime wildlife habitat, from rugged coastline to urban wildlife havens.

WTW supports the principle of an Action Plan that aims to improve conditions to support healthy populations of pollinators in Wales. This is a fantastic opportunity to make a real difference for pollinators in Wales and lead the UK in pro-active conservation.

To really tackle the decline of pollinators in Wales, **the action plan must be bold and visionary**. However, this document is more of a strategy than an Action Plan. WTW would expect another iteration of this plan with defined measurable actions.

The strategy is simple - The absence of flowers throughout the landscape is a major factor limiting the number of insects available for the pollination of wild flowers and agricultural crops. Therefore, we need to put a diverse range of wildflowers back into our countryside and towns, as well as the other important aspects of pollinators life cycles (shelter, nesting habitats etc). It should be made clear that what is required is that both the area and quality of habitat that needs increased. **We need bigger, better and more connected habitats.**

The Welsh Government and Local Authorities must lead the way by

- Undertaking a meaningful overhaul of the Public Estate (including Local Authorities, hospitals etc.) and change the management of our parks, road verges and 'amenity grassland'.
- Getting correct agricultural policies and funding in place to encourage and enable landowners to support pollinators in the farmed and wider environment.
- Supporting environmental NGOs in their work to increase biodiversity.

This issue of pollinators has widespread public support as evidenced with grassroots campaigning for the EU pesticide ban. The process and outcomes must not be allowed to go back to business as usual. This will require **a strong, statutory and policy steer from Welsh Government** – with implementation linked to Departmental or Public Body budgets. For example, lack of implementation will necessitate financial penalties via budget cuts.

Therefore, while we welcome the approach the consultation advocates, we now look to the Government to show leadership, remove obstacles and silo-mentality, to take bold steps and make brave decisions to help create **Living Landscapes** within a **Living Wales**.



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Gwarchod **Bywyd Gwyllt** ar gyfer y Dyfodol  
Protecting **Wildlife** for the Future

I have set out our detailed response in Annex 1. Once again, thank you for the opportunity to comment on this document.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James Byrne', with a stylized, cursive script.

James Byrne BSc, MSW, CEnv, MIEEM  
Living Landscapes Advocacy Manager

## ANNEX 1 - DRAFT ACTION PLAN FOR POLLINATORS

### QUESTION 1: DO YOU AGREE WITH OUR VISION FOR POLLINATORS IN WALES?

WTW welcomes the Welsh Government commitment to producing a pollinator action plan. The forthcoming action plan should be bold, **visionary and ground-breaking**. It should set *the* example for the rest of the UK countries to follow.

However, this document doesn't go far enough to make a meaningful difference to our pollinators. It is not an Action Plan as it lacks defined measurable actions. The Action Plan should be produced with stakeholders, using a **task and finish group** format. It should be SMART - containing costed, measurable and realistic actions and firm commitments to actions by the Welsh Government for the Public Estate.

We would also like to see some recognition of the intrinsic value of the pollinating insects themselves not just their benefits to man.

### QUESTION 2: HAVE WE IDENTIFIED THE MAIN AREAS OF CONCERN FOR POLLINATORS IN WALES OR ARE THERE FURTHER ISSUES YOU WANT TO IDENTIFY?

The five main areas of concern go some way to identifying the major threats, and we are pleased to see an emphasis in the action plan on increasing the provision of high quality and better connected habitats to support wild and managed pollinator populations. However, it should be made clear that what is required is both **area and quality of pollinator friendly habitat that needs increased**. Bigger, better and more connected habitats (as promoted by the **Lawton Review**).

This will require **a strong, statutory and policy steer from Welsh Government – and should be included in the forthcoming Environment Bill**.

It is also worth highlighting the use of avermectins and the impact they have on coprophagic species. These species provide vital nutrient recycling services.

### QUESTION 3: DO YOU AGREE WITH THE OUTCOMES IDENTIFIED, AND THE AREAS FOR ACTION TO ACHIEVE THEM? YOUR COMMENTS ARE WELCOMED.

WTW agree with the sentiment of the outcomes but believe that **what is proposed could go much further** and the Action Plan in its current state will not be able to achieve the vision for pollinators in Wales. There is a mismatch between the 'Outcomes' and the vagueness of many of the 'Actions', many of which are unspecific and aspirational rather than clear and deliverable.

### AREA FOR ACTION 1 (FARMLAND)

This is the elephant in the room. The majority of Wales is farmland of some sort and therefore getting this right may well be the key. **Modern agricultural practices, perverse subsidies and pervasive pesticides have all contributed to the massive decline** in wild and managed pollinators in Wales and the UK.

The absence of flowers throughout the landscape is a major factor limiting the number of insects available for the pollination of wild flowers and agricultural crops (Potts *et al.*, 2010, Carvell *et al.*, 2006).

There may be "simple measures" that can help achieve this but fundamentally substantial areas need to be managed in a completely different way – **bigger, better and more connected areas** of wildflowers and other sources of pollen and nectar.

What control can the Welsh Government have outside land that they manage? The truth is that the agricultural subsidies play a large part of the income farmers receive in Wales. Without these subsidies many farms in Wales could not survive. Therefore, **agricultural subsidies have the potential to deliver for pollinators**.

However, there are a number of issues that **agricultural subsidies** (and thus **RDP**) must address before it can fulfill this aspiration, such as;

- Glastir was not designed specifically for increases in pollinators and therefore changes to the prescriptions would be required. Pollinator-friendly options must be mandatory e.g. **Pillar 1 payments**.
- Uptake – Glastir is a voluntary agri-environment measure and thus ensuring an adequate level of uptake is essential. Currently **Glastir is undersubscribed and action is needed to increase participation**.
- Welsh Government would also need to provide a suitable incentive mechanism to encourage uptake of relevant ‘pollinator-friendly’ Glastir options, as well as sufficient support for landowners to ensure that they are able to fulfil the requirements of those options.
- Welsh Government must use the expertise within the NGO community more in relation to giving advice to landowners. **RDP money could be used to mainstream the provision of agri-environment advice into environmental NGOs** such as the Wildlife Trusts, Bumblebee Conservation Trust and Butterfly Conservation.

Other actions that should be integrated into agricultural subsidies and the action plan include

- Traditional farmland habitats such as **hedgerows, scrubs and trees are also important for pollinators**. The Action Plan should also encourage sensitive planting of important habitats on farmland (but not on existing important habitats), as they can provide valuable food, nesting habitat, shelter for flying insects as well as sources of pollen.
- Ensuring that the **woodland creation option is integrated with primary ‘pollinator-friendly’ options** (such as maintaining/ restoring existing flower-rich habitats, allowing field strips and corners to remain uncut/ grazed etc) would help to create a holistic suite of measures to improve conditions for pollinators.
- The increased use of **appropriate clover-leys** would do much to improve habitats for bees (some agricultural clover flowers are not pollinator friendly).
- Supporting the **fallow margins options** which will benefit all the local pollinators in an area by allowing wild plants to develop and thus work in combination with the clover in grass leys on pastoral farms.
- The Welsh Government should explore the principles of **High Nature Value farming**, which would also contribute to the objectives of providing higher quality pollinator-friendly habitat.

#### **AREA FOR ACTION 2 (WIDER COUNTRYSIDE)**

The absence of flowers throughout the landscape is a major factor limiting the number of insects available for the pollination of wild flowers and agricultural crops (Potts *et al.*, 2010, Carvell *et al.*, 2006).

##### *Connectivity*

WTW supports the need for a network of diverse and connected flower-rich habitats across Wales. A key part of this is connectivity and **green infrastructure**. In terms of habitat provision on a **landscape/site scale**, it is beneficial to consider how habitat provision for pollinators can dovetail with habitat provision for other wildlife. For example, habitat management for pollinators in damp/wet habitat could also benefit water voles, otters, odonata, plants and breeding birds if considered appropriately.

##### *Welsh Government Estate*

**The Welsh Government must manage the Welsh Estate (all land in public ownership), in partnership with environmental NGOs such as the Wildlife Trusts. They must create pollinator friendly policies that enable land to be brought into multi-functional use – that works for people, wildflowers and pollinators.** As such, the Welsh Government must be an exemplar to other landowners, demonstrating what can be achieved within a variety of settings - from urban offices to farmland.

##### *Local Authorities*

We recognise that **local authorities have a huge role to play in delivering habitat for pollinators**, especially in terms of connectivity. Therefore, we are surprised at the omission of **road verge management** in the consultation document. Our road verges include some of the last remnants of wildflower meadows in the UK (98% of which have been lost or degraded).

There are good examples, North Wales Wildlife Trust works with the Anglesey Council to maintain a suite of floristically **rich roadside networks**. However, this good example is not universal. Some councils don’t have roadside verge policies and those that do either many not be effective or have been reversed (i.e. Denbighshire Council).

**Statutory Guidance for Local Authorities is sorely needed on the management of road verges for pollinators** and other wildlife, without which wildflower-rich habitats will continue to be degraded and lost from road verges due

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to the continuation of inappropriate cutting regimes i.e., before wild plants have had a chance to flower and set seed. See <http://www.independent.co.uk/environment/nature/mown-down-the-wildlife-toll-on-uks-roadsides-8640800.html>

**Local Authorities must adopt and implement a Road Verge, Wildflower and Pollinator Action Plan** – based on Welsh Government, NRW and NGO template. Adoption and implementation of this policy should be a condition of the Welsh Government LA Grant.

### Case Study

Denbighshire County Council worked with the North Wales Wildlife Trust to create a Road Verge Policy. This Policy was looking at cutting rural verges in a more wildlife-friendly way so that wild plants can flower and set seed. Initially, two pilot areas were identified and managed much less intensively by delaying the timing of cutting till late summer / early autumn and avoiding cutting too low to minimise damage to soils.

This only occurred where road safety would not be compromised. The pilot project has been a great success and has demonstrated that simple alterations to road verge management can bring great rewards to biodiversity at no extra cost (and may actually save money in the longer term). The policies proposed by the project also contributed to delivery of targets set out in the UKBAP and Denbighshire LBAP to protect and enhance biodiversity.

In due course these policies were extended to other areas, including the Denbigh Moors and eventually the whole rural road network in Denbighshire. However, in autumn 2011, after a small number of complaints to local councilors about the verges looking 'untidy', Denbighshire County Council's Scrutiny Committee reversed the road verge policy, despite having produced thousands of leaflets that highlighted it to the public.

Developing comprehensive and measureable **road verge management** schemes should be a clearly defined action. This will require working closely with and supporting local authorities to help them change their practices – e.g.

- adjustments to contracts with external contractors,
- collection of grass cuttings to prevent nutrient rich soil conditions developing on verges where practicable etc.
- adjusting mowing regimes may also require additional litter picking and information to win over the public and address any concerns over road safety.

### *Biodiversity Champions*

We welcome the emphasis on protection and management of habitats which benefit pollinators but question whether **Local Authority Biodiversity Champions** are the right vehicle. The Wildlife Trusts fully support and value the role of Biodiversity Champions but they are not supposed to be "experts" and are often not in place for long enough to achieve continuity.

There is no indication of what support they would be given and we feel that ultimately, the plan would therefore rely on the Local Authority Ecologist and Biodiversity Officer. These roles are already constrained or under resourced in many local authorities, therefore any additional targets placed on these officers should be supported by appropriate funding.

### *Wildlife Sites*

It is important to link up valuable habitats and also link up statutory and non-statutory sites. The Action Plan must also recognize that many designated sites are not in favourable condition and much work is needed to restore and protect these habitats through beneficial management. We welcome the inclusion of **Sites of Importance for Nature Conservation (SINC)**.

They protect threatened species and habitats which act as buffers, stepping stones and corridors between nationally-designated wildlife sites. The Wildlife Trusts have worked with local authorities, statutory agencies, landowners and other local partners to establish effective systems for identifying, managing and monitoring Local Wildlife Sites.

The Action Plan should recognise the current vulnerable position of these non-statutory sites across Wales, as they receive very little protection or beneficial management. The planning system that does not give sufficient weight to their protection even though they **deliver multiple ecosystem services**.

The Welsh Government must recognize these sites as vital links in a chain to protect our pollinators and support organisations that seek to identify, protect and manage them. **The ultimate aim should be to have a functioning Wildlife Sites system across Wales** which helps landowners to manage their sites, by providing advice and small grants. It is important to ensure that this allows landowners to maintain as well as restore valuable habitats.

There are existing and proposed regional wildlife sites projects which could be supported in the action plan, including the proposed 'South East Wales Wildlife Sites Project' (SEWWSP) and Gwent Wildlife Trust's **Monmouthshire Natural Assets programme** which the SEWWSP is using as a successful model of Local Wildlife Sites working.

### Case Study

A good example of this is Gwent Wildlife Trust's – **Monmouthshire re Natural Assets** programme - The Monmouthshire Natural Assets Project aims to help identify and support the care of some of the best places for wildlife in Monmouthshire – 'Local Wildlife Sites'. This project

- Runs from summer 2011 until Dec 2013, delivered by GWT in conjunction with Monmouthshire County Council.
- Two day/wk project officer, plus seasonal surveyor over the summer months.
- One of a suite of projects supported under Axis 3 of the Monmouthshire Rural Development Plan. CCW also provides funding.
- Builds on GWTs work over the last 10 years on Local Wildlife Sites in the county to support existing LWS owners and also identify new LWS. There are over 300 species-rich grassland Local Wildlife Sites in Monmouthshire (over 300ha in total).
- Supported by a **small capital grants scheme** (aim to award 35 grants of max £2,000 over life of project) for works which help enhance and restore LWS.
- Focuses on species-rich grasslands but is also looking at woodlands, wetlands.

The Monmouthshire Natural Assets Project is making a substantial contribution to the sensitive management and safeguarding of Monmouthshire's Local Wildlife Sites, some of the best places for wildlife in the county.

**The project contributes significantly to the delivery of UK, regional and local biodiversity action plans** and associated targets through the identification and improved management of Local Wildlife Sites. The project provides botanical surveys plus expert wildlife and management advice to landowners, as well as access to financial resources (£70k pot of Natural Assets Environment Grants) to enable much needed management works.

The impact and future longevity of the work will be strengthened by engaging local communities in the restoration and management of sites, and by nurturing an appreciation of the value of the sites and developing the skills to care for them.

### Stakeholder Projects

All Wildlife Trusts and some other environmental organisations already have projects, at different scales, from local projects to landscape scale partnerships. The Welsh Government should look to support this work and work in partnership with these organisations to create a **'best practice for pollinators'** guide.

The Wildlife Trusts, along with other organizations, manage **nature reserves** to benefit all wildlife including pollinators. For example, our management of heathlands creates an important late summer pollen source. The Welsh Government should work with these organisations to **create Living Landscapes within a Living Wales**.

### Orchards

The creation and restoration of **traditional orchards** would also benefit pollinators, especially where the grassland within the orchard is also managed as a meadow/pasture. Orchards can also contribute to the local and national economy through production of artisan products such as cider and perry. The action plan could also consider the benefits of promoting forest gardens and permaculture.

### Case Study

The North Wales Wildlife Trust, with funding from the Welsh Government, set up by the North East Wales Orchard Initiative (NEWOI) in order to plant new orchards to protect old fruit varieties. The project aims to restore local

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Protecting **Wildlife** for the Future



fruit growing and all its benefits throughout Wrexham, Denbighshire and Flintshire. Well-managed orchards produce good quality local food and are places where wildlife thrives. Birds and butterflies value windfalls in autumn, the grassland is often full of wildflowers, and decaying timber is food to a multitude of insects. The project brought old orchards back into productive use for wildlife and people as well as creating new orchards. It created a living demonstration of how important wildlife-rich habitats are to people.

### **AREA FOR ACTION 3 (TOWNS, CITIES AND DEVELOPED AREAS)**

It is an important objective to promote flowering habitats and landscapes of benefit to pollinators in our towns, cities and developed areas. It provides a chance to highlight the need for pollinators to the widest population.

The Draft Action plan states that the Welsh Government will “...continue to incorporate pollinator friendly policies across our administrative estate...”. However, little evidence was given to suggest what the Welsh Government is doing. The Welsh Government should be setting the example, and therefore what they are doing on their estate should be made public so that it can be measured and good practice shared (and bad practice avoided).

However, there is no mention of **requiring Local Authorities to manage their estates, parks and public spaces** in a pollinator-friendly way. This, along with the Welsh Government estate, is the ‘**quick win**’ and would be a huge **missed opportunity if not included**. This includes industrial parks, hospital grounds, police stations and Local Authority buildings.

**Remember space is three dimensional – so Local Authorities and other landowners should be encouraged to make imaginative use of walls, roofs and other structures by using climbers and placing bee hives and window boxes on buildings or in grounds.**

It is vital that Local Authorities follow the lead of the Welsh Government in incorporating pollinator-friendly policies across its administrative estate. **Local Authorities must adopt and implement a pollinator action plan – based on Welsh Government (and NGO) template. Adoption and implementation of this policy will be a condition of the Welsh Government LA Grant.** Only with a Welsh Government directive, and linked to Local Authority Grant will this be achieved.

Detailed case study examples from local authorities where a change in management has been successful would be extremely helpful as a good practice guide.

Actions could include pollinator friendly bedding plants, flower-rich road side verges, wildflower meadows in parks and using ‘amenity grassland’ to provide multifunctional benefits. The current situation with **excessive grass cutting** and the **use of bedding plants with no value to pollinators is not acceptable**. This includes swapping non-native daffodils for native Welsh daffodils that not only are beneficial to pollinators but also withstand the Welsh climate better than the tall, weak cultivars that collapse on themselves at the first sign of a breeze.

Promoting wildlife gardening or the principles behind wildlife gardening would not only create additional pollinator friendly habitats but raise awareness also. See Case Study below;

### **Case Study**

North Wales Wildlife Trust, with partners, organize many wildlife gardening initiatives. These include

- **Community Gardens;** Green field sites, parks and gardens – nectar borders, meadows and wild flowers, hedge and tree planting, ponds, bird and bat boxes, insect homes and habitat, composts etc. Over 50 different sites
- **Churchyards** - Living churchyard project in Flintshire – meadows, trees, composts, insect homes. About 10 projects at present.
- **Schools** - nectar borders, meadows and wild flowers, hedge and tree planting, ponds, vegetable gardens, orchards, bird and bat boxes, insect homes and habitat, composts, etc. Advice or practical help in over 200 schools.
- **Business gardens**, e.g. orchard and allotment creation with Toyota, pond building at Bangor University site

#### **ACTION 4: SUPPORTING UK ACTION TO PROMOTE HEALTHY POPULATIONS OF POLLINATORS IN WALES**

We support action to continue to implement the Healthy Bees Plan, however, the remainder of the 'actions' are rather vague. WTW would expect the final action plan to contain more targeted and measurable actions.

#### **ACTION 5: WORKING TO RAISE AWARENESS OF THE IMPORTANCE OF POLLINATORS AND ENGAGE OUR CITIZENS IN THEIR MANAGEMENT**

We support the need to raise awareness of the importance of pollinators amongst the public, landowners, schools, businesses and local authorities. The Wildlife Trusts and other environmental NGOs have a wealth of experience and material available for engaging with these groups - <http://www.wildlifetrusts.org/node/4061>.

We would encourage Welsh Government to further its commitments in helping stakeholders continue this work.

##### **Case Study**

North Wales Wildlife Trust, with partners, undertake many wildlife gardening projects that are designed to raise awareness, such as

- **Wildlife Garden Competition** with feedback from judges on how to optimise bee and other wildlife habitat in Private, School, Community and Business gardens. Coverage: Gwynedd, Conwy, Anglesey. Entrants: about 55 per year. Annual event for 8 years, subject to funding availability.
- **Wildlife Garden Open Days** – Best examples of gardens identified through the competition. Coverage: Gwynedd, Conwy, Anglesey. Visitors about 700 per year. 3 year project.
- **Open days – bee specific events** to be held spring/summer 2013 in Partnership with Friends of the Earth and Snowdonia Society. **Presence at other events** such as farm shows, town festivals, community days, etc. **promoting wildlife friendly gardening.**
- **Illustrated talks** – various community groups and professional organisations.
- **Training** – day and half day courses on how to create a meadow, nectar borders and a wildlife garden in general. Venues: Rhyd y Creau Field Study Centre, Antur Waunfawr, Pensychnant Conservation Centre and schools in North Wales.
- **TV, radio and newspapers** -regular presence in English and Welsh speaking media.

In addition, the impact of **invasive alien species** should be considered, e.g. **Himalayan Balsam**. Many beekeepers see this as an important plant however, non-native invasive species are regarded as the second biggest threat to biodiversity (after habitat loss). For example, if allowed to remain, Himalayan balsam can outcompete native plant species, greatly reducing biodiversity and negatively impacting on the native ecosystems. By exposing bare soil when it dies back in winter, it causes soil erosion leading to sediment entering the river that can silt up spawning grounds. Also the bare soil can lead to a faster rate of rainwater entering the river from surrounding farmland resulting in greater amounts of fertiliser running into water systems, degrading the chemical status of the water. **Controlling invasive species will help to maintain ecological diversity and therefore pollinators.**

We support the use of Gwlad and Farming Connect to engage with landowners about pollinators. We would ask that there is a more firm commitment to doing this. Many environmental NGOs also give advice to landowners but this advice is ad hoc and not mainstreamed. Therefore, Welsh Government could fund environmental NGOs such as the Wildlife Trusts to mainstream this advice into their workplans.

#### **ACTION 6: LINKING TOGETHER WELSH GOVERNMENT POLICIES TO PRODUCE BENEFICIAL ACTIONS THAT ARE GOOD FOR POLLINATORS AND THEREFORE WIDER ECOSYSTEM HEALTH**

WTW welcome the principle of linking together Welsh Government policies to ensure an integrated approach to biodiversity. However, it is unclear from the points in the consultation document how Welsh Government are going to do this. More clarity is required.

**It is vital that an action plan is created for, and is backed by, each ministerial portfolio.** The widespread use of the public estate cannot be achieved if there is not buy-in from other departments. This should be integrated into outcomes such as health benefits, social justice (access to greenspace), tourism, flood attenuation, planning – all new applications for housing estates should include pollinator friendly planting etc.

#### **ACTION 7: BUILDING AN EVIDENCE BASE TO SUPPORT FUTURE ACTION FOR POLLINATORS**

While we support building an evidence base in general, there currently is a large amount of evidence already to justify the urgent action required. It is important that we monitor the effectiveness of action in order to adapt or discontinue actions that are not working and roll out actions that are successful.

#### **QUESTION 4: HOW COULD YOU CONTRIBUTE FURTHER TO THE AREAS FOR ACTION IDENTIFIED?**

**How could we support you to do so?**

- Wildlife Trusts actively manage over 6000ha of reserves most of which are important for pollinators such as heathland such as **Montgomeryshire Wildlife Trusts**, Glaslyn Nature Reserve (part of the Pumlumon Living Landscape) and
- species rich grassland such as **Radnorshire Wildlife Trusts**, Gilfach Nature Reserve (part of the Cwm Marteg Living Landscape).

The Trusts also undertake a variety of projects within and outwith their Living Landscape schemes such as

- **Brecknock Wildlife Trusts** 'Wild About Gardens' Project
- **Wildlife Trust of South and West Wales** Gwendreath Grasslands project
- **Gwent Wildlife Trusts** – Shrill Carder Bee Project

#### **Case Study**

GWT's Shrill Carder Bee project aims to increase awareness of the Shrill Carder bee and its habitat requirements in south east Gwent, and engage with landowners to increase the availability and connectivity of wildflower-rich habitats. Activities include provision of bumblebee identification training and events, and provision of advice on the management of grasslands for bees, together with local wildflower seed sowing on appropriate receptor sites.

Therefore, Welsh Government help with such schemes are vitally important.

As mentioned above, **many environmental NGOs also give advice to landowners. Welsh Government could fund environmental NGOs such as the Wildlife Trusts to mainstream this advice into their workplans.**

The Wildlife Trusts can support the further development of clear and deliverable actions as well as provide advice and services to monitor outcomes.

#### **QUESTION 5: WOULD YOU LIKE TO BE INVOLVED IN DEVELOPING THE ACTIONS NEEDED TO ACHIEVE THE OUTCOMES? IF SO, IN WHAT WAY?**

Yes. Wildlife Trusts would welcome involvement in developing the actions as we have both technical and project management expertise which could help develop actions. We suggest that a **Task and Finish Group**, with Welsh Government and stakeholders, is set up to develop the next phase of the Action Plan.

#### **QUESTION 6: WE HAVE ASKED A NUMBER OF SPECIFIC QUESTIONS. IF YOU HAVE ANY RELATED ISSUES WHICH WE HAVE NOT SPECIFICALLY ADDRESSED, PLEASE USE THIS SPACE TO REPORT THEM:**

WTW supports the principle of an Action Plan that aims to improve conditions to support healthy populations of pollinators in Wales. However, this document is more of a strategy than an Action Plan, and is lacking in defined measurable actions. **The final Action Plan will need SMART actions and achievable targets and outcomes**, along with some substance to monitor actions and result indicators to measure progress.

To really tackle the decline of pollinators in Wales, **the action plan must be bold and visionary.** This must not be allowed to go back to business as normal. The duty placed on Public Authorities by the **NERC Act 2006** to preserve biodiversity **is already too often ignored and the Welsh Government should take steps to ensure that this situation does not continue.** The Welsh Government and Local Authorities must lead the way by undertaking a major overhaul of the Public Estate.

This will require a strong, statutory, steer from Welsh Government – with implementation linked to Departmental or Public Body budgets. For example, lack of implementation will necessitate financial penalties via budget cuts.

**This is a fantastic opportunity to make a real difference for pollinators in Wales and lead the way for the UK**, but the current document doesn't go far enough. We have to think bigger to make sure that we don't miss our chance in enhancing Wales' habitats for pollinators and boosting the populations of bees, hoverflies and other pollinating insects – as well as the other wildlife that relies on them.

**The following are examples of potential actions that should be implemented**

- Local Authorities and Highways Department to adopt and implement a Road Verge Policy – based on Welsh Government, NRW and NGO template. Adoption and implementation of this policy will be a condition of the Welsh Government LA Grant.
- All Public Bodies and Government Departments to adopt and implement a wildflower and pollinator action plan – based on a Welsh Government, NRW and NGO template. Adoption and implementation of this policy will be a condition of the Welsh Government LA Grant.
- Include mandatory pollinator friendly options in Glastir and Pillar 1 'greening' payments.
- Glastir should encourage the creation of species rich grassland.
- Welsh Government must use the expertise within the NGO community more in relation to giving advice to landowners. By using RDP money to mainstream the provision of agri-environment advice into environmental NGOs such as the Wildlife Trusts, Bumblebee Conservation Trust and Butterfly Conservation.
- Development and implement a heather creation and restoration strategy – this would involve funding environmental NGOs to deliver new heather creation and also undertaking heather creation/open ground habitats on the Public Estate.
- Woodland creation schemes / restoration schemes should prioritise pollinator friendly planning.
- Welsh Government should support high profile conservation efforts such as Shril Carder Bee which then can be used as a public engagement tool.
- Commit funds to fully implement the flies and wasps on the Section 42 list
- Traditional farmland habitats are also important for pollinators such as hedgerows, scrubs and trees. The Action Plan should also encourage sensitive planting of important habitats on farmland (but not on important habitats), as they can provide valuable food, nesting habitat, shelter for flying insects as well as sources of pollen.
- Ensuring that the woodland creation option is integrated with primary 'pollinator-friendly' options (such as maintaining/ restoring existing flower-rich habitats, allowing field strips and corners to remain uncut/ grazed etc) would help to create a holistic suite of measures to improve conditions for pollinators.
- The increased use of clover-leys would do much to improve habitats for bees.
- Supporting the fallow margins options, which will benefit all the local pollinators in an area by allowing wild plants to develop and thus work in combination with the clover in grass leys on pastoral farms.
- The Welsh Government should explore the principles of High Nature Value (HNV) farming, which would also contribute to the objectives of providing higher quality pollinator-friendly habitat.
- It is important to link up important habitats and also link up statutory and non-statutory sites. The Action Plan must also recognize that many designated sites are not in favourable condition and much work is needed to restore and protect these habitats through beneficial management.
- All Wildlife Trusts and some other environmental organisations already have projects, at different scales, from local projects to landscape scale partnerships. The Welsh Government should look to support this work and work in partnership with these organisations to create a '**best practice for pollinators**' guide.
- Smallholder grants to help landowners who are not eligible for Glastir to manage orchards, Local Wildlife Sites and other important habitats.
- The actions needed to improve conditions in our urban and developed areas need careful consideration. This could include pollinator friendly bedding plants, flower-rich road side verges, and wildflower meadows in parks and using 'amenity grassland' to provide multifunctional benefits. The current situation with **excessive grass cutting** and the **use of bedding plants with no value to pollinators is not acceptable**. This includes swapping non-native daffodils for native Welsh daffodils that not only are beneficial to pollinators but also withstand the Welsh climate better than the tall, weak cultivars that collapse on themselves at the first sign of a breeze.
- An action plan should include
  - utilising their estate including putting in green roofs, green walls, bee hives, and 'bee hotels' on Government buildings

- modifying estate management via planning native wildflowers (including native daffodils) and changing the mowing regime.
- Enhance and/or create hedgerows and woodlands/tree belts on using native, pollinator friendly species.
- Undertake pond construction on Welsh Government estate
- The management of the Public Estate should aim to become pesticide free and encourage natural pest control by encouraging natural predators.
- A deadwood strategy to retain standing deadwood or create areas of dead wood.