



Public consultation on the Call for Evidence to the EU Pollinators Initiative – revision

SAFEGUARD Submission

9 June 2022

SAFEGUARD welcomes the opportunity to submit its opinion to the European Commission’s public consultation on the Call for Evidence to the EU Pollinators Initiative revision. The consultation survey covers key aspects relating to the implementation of the existing action framework and the steps needed to strengthen EU action on pollinators to meet the EU’s commitment of reversing the decline of pollinators by 2030. This complementary written submission offers some additional information and remarks to elaborate on the opinions expressed in the survey.

Safeguarding European Wild Pollinators (SAFEGUARD) is an EU Horizon-2020 funded project. Bringing together 25 organisations from 14 European countries and China, it aims to substantially contribute to reversing the loss of wild pollinators across Europe by expanding our current assessment and understanding of their status and trends. Our goal is to inspire policy and practice solutions that safeguard wild pollinators and their benefits. We aim to provide relevant and timely evidence to inform pollinator-relevant policies, including the strengthening of the EU Pollinators initiative to 2030.

This response has been prepared by the Institute for European Environmental Policy (IEEP), a sustainability think tank leading SAFEGUARD’s policy engagement work. It builds on IEEP’s past work on pollinator conservation and inputs from pollinator experts within the project’s consortium.

In this response we put forward the following inputs, evidence, and key recommendations on (1) the design and implementation of current EU action on wild pollinators and (2) what more needs to be done to reverse the decline of pollinators:

I. Improving our knowledge on pollinator decline, its causes, and consequences

Key research needs that should be addressed through the new EU Pollinators Initiative:

- Regarding **status and trends**: Increased research efforts should be directed towards overlooked pollinator groups (such as beetles and flies other than hoverflies), and to measuring and assessing pollination service trends (both crops and wild plants). There is also a need for indicators of pollination services of crops and wild plants. There is also need for more information on pollinators in the EU overseas territories and beyond.
 - Recommendation: Invest on digitalizing pollinator collections hosted in EU museums¹.
 - There are millions of well-curated specimens preserved in museums across the EU, which are not digitalized. This information, already collected, but not accessible to researchers, is pivotal to understanding the baseline situation of pollinator populations (which species were present where in the past) and comparing this to

¹ Bartomeus, I., Stavert J. R., Ward D. and Aguado O. 2019 Historical collections as a tool for assessing the global pollination crisis. Phil. Trans. R. Soc. B3742017038920170389. <http://doi.org/10.1098/rstb.2017.0389>

- current distributions and population trends. Historical data, while imperfect, is our best chance to understand the past to predict the future of pollinators.
- **Recommendation:** use the new European Red Lists of pollinator groups (once they are published) to define Key Biodiversity Areas for wild pollinators in the EU (using the KBA criteria threatened biodiversity, geographically restricted biodiversity, ecological integrity, biological processes, and irreplaceability).
 - **Recommendation:** Support through EU PoMS, in conjunction with Horizon Europe, the development and testing of pollination monitoring methods and indicators so that the trends in crop and wild flower pollination can be monitored across the EU. This should include assessment of both the contributions of pollinators to crop yield and quality and wild flower reproduction, and also have the power to identify pollination shortfalls (i.e. deficits) and so act as an early warning system identify food crops, wild flower communities and geographic regions most at risk from loss of pollination services.
 - **Recommendation:** provide funding to fill the knowledge gaps on pollinator communities, and in particular under-represented taxa (e.g. beetles and non-hoverfly flies) and their habitats identified in the EU habitat action plans for dry calcareous grasslands and dry heaths and the EU pollinator species action plans. Fund research on importance of forests for pollinators - forest habitats (with edges and clades) seem to play a larger role than previously expected for pollinator conservation².
- Regarding **drivers and pressures:** the EU pollinator monitoring scheme should be linked as much as possible to monitoring of pressures (e.g. through EMBAL and LUCAS). Improved methods and larger-scale research to assess the effectiveness of mitigation actions on pollinator populations are needed (see CAP recommendations below). More knowledge is needed on the impacts on pollinators of nitrogen deposition, air pollution (particulates), and metal pollution, as well as understanding of the impacts of combined, interactive, cumulative, and long-term pressures.
 - **Recommendation:** The EEA to develop an indicator and monitoring of light pollution in the EU under the Zero Pollution Action Plan³. Integrate latest research findings on impacts of light pollution on pollinator populations into the indicator assessments. The EU and several other parties to the Convention on Biological Diversity have proposed to include light pollution within the scope of a pollution reduction target in the Post-2020 Global Biodiversity Framework (CBD, 2021).
 - Regarding **response options:** more research should be directed towards understanding what responses are needed where and to what degree, and on how to integrate non-economic values associated with pollinators in decision making.

² Ganuza, C, Redlich, S, Uhler, J, Tobisch, C, Rojas-Botero, S, Peters Marcell, K, Zhang, J, Benjamin Caryl, S, Englmeier, J, Ewald, J, Fricke, U, Haensel, M, Kollmann, J, Riebl, R, Uphus, L, Müller, J and Steffan-Dewenter, I (2022) Interactive effects of climate and land use on pollinator diversity differ among taxa and scales. *Science Advances* No 8 (18), eabm9359. <https://doi.org/10.1126/sciadv.abm9359>

³ For further information see: Bougas, K, Constantine, L, Moccia, L, Baroni, L, Ermler, S and Martin, O (2022) Support in Scoping the 2022 EEA Zero Pollution Monitoring Framework Assessment: Task 3: Additional indicators and/or qualitative case studies to address identified gaps and more broadly support the identification of key/emerging issues. Wood, IEEP & University of Brunel study for EEA, Unpublished. Case study 1 – Light pollution and biodiversity (p27)

- **Recommendation:** Establish an expert group on invasive alien species and pollinators, to horizon scan emerging IAS threats, including invasive pollinators, plants, pathogens and pests, and carry out risk assessments of potential IAS of Union Concern that could be a threat to pollinators.

II. Tackling the causes of pollinator decline

- **The Commission should ensure that protected area expansion to reach the EU Biodiversity Strategy target of protecting 30% of EU land considers the protection of endangered pollinator species and habitats**
 - MS can use national Red Lists and other databases on wild pollinators as criteria to identify priority areas to establish new protected areas and OECMs, and to add wild pollinator species as conservation objectives in existing protected areas and their buffer zones. MS should demonstrate how their pledges contribute to reaching the target for reversing pollinator declines by 2030.
 - **Recommendation:** Develop guidance to national biodiversity agencies on how to use information on wild pollinator communities and their conservation status in criteria to select areas for protection (e.g., KBAs), and define appropriate conservation management and monitoring. Provide guidance on how other effective area-based conservation measures (OECMs) can contribute to pollinator species and habitat protection.
 - **Recommendation:** Fund communication and awareness action and a process of engagement with protected area managers based on the EU habitat action plans for dry calcareous grasslands and dry heaths and the EU pollinator species action plans. These action plans include detailed recommendations on how to identify key areas for protection of wild pollinator communities, how to plan and implement appropriate conservation management, and how to set up adaptive management.
- **Action on restoring pollinator species and habitats must be strengthened by ensuring the EU nature restoration law delivers for wild pollinators.**
 - **Recommendation:** The new proposal for legally binding EU nature restoration targets should (1) include a dedicated target on pollinators and (2) identify restoration needs of pollinator species and habitats to inform the design and evaluation of MS national restoration plans.
- To strengthen the protection of pollinator species and habitat in and around farmland, the **Commission and MS must ensure that the design, implementation, and review of CAP strategic plans for this funding period is in line with the goal to reverse pollinator declines, and that the steps are taken to ensure the next funding period of the CAP strengthens its support for pollinator-friendly farming⁴.** The Commission and MS should ensure that the 2023-2027 CAP supports the improvement of pollinator habitat and species on farmland and

⁴ Mottershead, D and Underwood, E (2020) Integration of pollinator conservation into the Common Agricultural Policy. Report for European Commission under support contract for EU Pollinators Initiative, Institute for European Environmental Policy (IEEP), Brussels. <https://wikis.ec.europa.eu/display/EUPKH/Agriculture>

does not incentivise measures which are harmful to pollinators through the CAP strategic plan implementation, evaluation, and review process. Monitoring the pollinators in a standardised way across the EU is fundamental to make informed decisions. The EU Pollinator Monitoring Scheme plays a relevant role. The inclusion of an indicator to assess wild pollinators' species of Community interest in the CAP is positive. However, besides pollinator status, there are more types of indicators identified in the scheme proposal that are relevant for, such as indicators on indirect impact, for instance the use of fertilisers, pesticides, and pressures such as landscape fragmentation or land take. The integration of these types of indicators in relevant policies, especially in the CAP, is important to achieve successful assessment and implementation at Member State level.

- **Recommendation:** Carry out capacity building workshops for CAP evaluators to assess impacts of CAP funded measures on pollinators. Develop specific recommendations on how to ensure the CAP delivers for pollinators ahead of the 2025 CAP performance review. These should be in line with the most up-to-date pollinator science to ensure the CAP is aligned with current best practice and scientific knowledge.
 - **Recommendation:** Promote measures which incentivise farmers to network their pollinator habitats with neighbours at landscape scale and bring farmers and other land managers together in pollinator conservation networks.
 - **Recommendation:** Ensure that pollinator action in farmland is further enhanced in the next CAP funding period (2027-2034).
 - **Recommendation:** Include a pollinator indicator in the CAP as soon as the EU pollinator monitoring scheme starts to report data.
 - **Recommendation:** Use ENRD to develop and promote experiences and best practices of ecoschemes and agri-environment schemes that work for pollinators, with attention to the results-based approach. Develop dedicated pollinator ecoschemes that MS can incorporate in their CAP SPs in their mid-term review or in the next CAP funding period.
- **Support cities and regions in the integration of pollinator conservation in their urban greening plans.** The planting of trees in urban areas, which will contribute to meeting the EU Green Deal Goal of planting **three billion additional trees by 2030**, should consider pollinator species and habitat needs when selecting tree species and locations.
 - **Recommendation:** The Commission develops guidance together with leading regions and cities on how to incorporate pollinator species and habitat conservation into urban greening plans. How to assess pollinator habitat and species status and condition in cities. How to include pollinator relevant objectives. How to reduce pesticide use and reform green spaces management to make it pollinator friendly.
 - **Recommendation:** The Commission should actively promote community involvement and ownership of pollinator conservation through the Urban Greening Plans.
 - **Recommendation:** Knowledge exchanges could be organised on how best to include local communities in pollinator strategies and urban greening plans, green space management for pollinators, and on managing honeybee densities in urban areas.

- **Additional resources are needed to ensure the efficient implementation of pollinator species and habitat action plans (Action 4A).** We welcome the development of action plans for semi natural dry grasslands and European dry heaths and current work to develop 3 species action plans to conserve the most threatened EU pollinators. However, the implementation of these action plans must be adequately supported and resourced to ensure they truly contribute to the conservation of pollinators and their habitats.
- **MS have not used their Sustainable use of Pesticides Directive National Action plans to proactively restrict and manage pesticide use to reduce its impacts on wild pollinators (Action 7A)⁵.** The revision of the Sustainable Use of Pesticides Regulation (expected in June 2022) will likely require MS to revise their plans. Increased guidance and support should be given to improve the consideration of pollinators in these plans, including the creation of targets for pollinator population recovery in line with the 2030 target. It is important that there is higher integration of the pesticide and pollinator targets at the national level.
 - Recommendation: Scrutinise revised MS action plans for their identification of specific protection objectives for pollinators and use the SUD working group and Commission assessments to highlight where MS have or have not set targets and indicators, identified high risk pesticides and/or uses, and defined measures to reduce pesticide pressures on pollinators.
- **Several additional actions could be taken to reduce the impacts of pesticide use on pollinators⁶:**
 - Develop a more unified approach to pesticide risk labelling, promote drift reduction techniques and raise awareness and regulatory controls.
 - Create collaborations between authorities responsible for SUD and Natura 2000 to minimise pesticide use in protected areas and buffer zones around them.
 - Ensure training and awareness on pesticide risk and use reduction, implement measures to prioritise non-chemical methods of pest control and develop farm advisory systems to help farmers implement IPM practices.
 - Set up mechanisms to share and exchange good practices between countries.
- **A neglected threat to pollinators is the increasing movement of commercial pollinators through Europe (bumblebees, mason bees, etc).** A pervasive but underappreciated threat of pollinator introductions is their potential impact on the genetic integrity of native pollinators. We already documented bumblebee genetic introgression between native and commercially introduced subspecies⁷. As pollination services demand will increase in the coming years, only a more restrictive regulation of commercial lines could mitigate their negative impacts on the genetic integrity of native pollinators, avoid processes of genetic homogenization, and prevent the potential disruption of local adaptations.

⁵ Underwood, E (2020) Pollinator conservation in Member States' national action plans for the sustainable use of pesticides. Report for European Commission under support contract to EU Pollinators Initiative, Institute for European Environmental Policy, Brussels. <https://wikis.ec.europa.eu/display/EUPKH/Pesticides>

⁶ Underwood, E (2020) as above

⁷ Bartomeus, I, Molina, FP, Hidalgo-Galiana, A, Ortego, J. Safeguarding the genetic integrity of native pollinators requires stronger regulations on commercial lines. *Ecol Solut Evidence*. 2020; 1:e12012. <https://doi.org/10.1002/eso3.12012>

- **Recommendation:** More information and risk assessment approaches need to be developed to mitigate the risk of pathogen spill-over from managed pollinators (honeybees, bumblebees, mason bees) and wild pollinator populations.

III. Raising awareness on pollinator decline, engaging society, and promoting collaborations

- **New guidance should be produced on how to manage protected areas sites for pollinators**

These should include recommendations on how to integrate pollinators in Natura 2000 site conservation objectives and management plans, as well as guidance on managing other protected areas and OECMs for pollinator conservation.

- **The EU Pollinators Information Hive is a relevant resource which should be regularly updated and integrated with new EU pollinator initiatives to ensure it implements the goal to facilitate knowledge sharing (Action 3B)**

- **Recommendation:** To become a one-stop-shop for pollinator information in the EU, the Hive could be improved to become more easily updated. The fiches showcasing pollinator action in each MS could become live sections of the website where individuals with knowledge on wild pollinator actions and projects in their regions and localities can submit suggested additions and changes.
- **Recommendation:** Promote the translation of the provided pollinator information into more national languages particularly in Eastern Europe, by providing technical assistance and other support to national biodiversity agencies.
- **Recommendation:** engage regional networks and cities in implementing actions under the EU Pollinators Initiative, e.g. the **Committee of the Regions**⁸, Eurocities, ICLEI, partners in the pesticide free towns network.

- **More guidance, support, and resources are needed for national and local pollinator strategy development**

- **Recommendation:** Provide more guidance on the development, design and implementation of national and local pollinator initiatives building on best practice in the EU and beyond. This needs to build on the best available knowledge at national level, starting with national red lists.
- **Recommendation:** Support mutual learning and the sharing of best practice between national and regional authorities at different stages of designing pollinator strategies through EU funding mechanisms such as the EU policy learning platform of Interreg Europe. A local and regional pollinator network or pledge could bring together regions or cities that have adopted a pollinator strategy or action plan (as the Promote Pollinators platform does for national governments) and encourage more to make a strategy or plan.

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⁸ CoR (2021) Local and regional authorities accelerating the implementation of the EU Pollinators Initiative. Opinion Factsheet. Available at : <https://cor.europa.eu/EN/our-work/Pages/OpinionTimeline.aspx?opId=CDR-3508-2021>