

---

## Help save bees and other pollinators

---

Assistance from Europe's insect conservation experts to help you to respond to the important consultation on the revision of the EU Pollinators Initiative

### Background

Insect populations are currently in rapid decline across Europe with rates of loss of insect abundance of about 30% per decade. Insects are crucial to healthy ecosystems, food security, pollinating wildflowers, disposing of waste and feeding birds, fish and other animals. Unless insect declines are halted and reversed, we are facing a bleak and hostile future.

In June 2018, the Commission adopted the [EU Pollinators Initiative](#), the first-ever EU framework to tackle the decline of wild pollinators. This EC initiative was very welcome and helped to raising awareness on the problem among public and decision makers. There was good progress on several actions, but the range and depth of action has not been sufficient to stop, or even slow, the decline of pollinators.

Reviews of the implementation of the Initiative have been undertaken by the [European Court of Auditors](#) and by the [EC itself](#).

Wildlife and environmental charities broadly agree with the conclusions of these reports: despite good intentions and progress on several tasks, Europe has failed to translate these into sufficient change to land management to slow the loss of invertebrate populations. In addition, a number of issues impacting on pollinators were not addressed in the Pollinators Initiative. Urgent action is needed to:

- Restore and reconnect wildflower rich habitats across the continent so that species are again able to disperse and can respond to climate change.
- Implement sustainable and eco-friendly agriculture, so that farming coexists more successfully with pollinators.
- Improve pesticide risk assessment so that we do not keep repeating the damage to bee and butterfly populations caused by recent pesticide use.

- Secure long-term commitment to monitor populations of flying insects across Europe so that we can measure progress and better identify priorities and target remedial action.
- Reduce air pollution, including nitrogen deposition, which is robbing pollinators of safe breeding areas.
- Reduce light pollution – which is driving down populations of nocturnal pollinators (a very underappreciated ecosystem service).
- Develop and fund bespoke action to prevent the extinction of rare and endangered pollinator species.
- Increase the resources within the European Commission to ensure that firm action is secured across directorates, and that the action of Member States is supported and coordinated where necessary.

It is important that the public, who care greatly about bees, butterflies, moths, hoverflies and other insects, make sure that the European Commission, Member States and other stakeholders are in no doubt about the urgency of stepping-up action to save pollinators from their current declines and extinctions.

Invertebrate experts and conservation NGOs, including [members of the European Habitats Forum](#), have come together to encourage everyone to submit responses to the ongoing EC consultation on revising the Pollinators Initiative.

There are nine questions in the consultation and below is our advice on how to answer them. The [blue text](#) provides explanations and context for our suggested answers.

In addition there is a free text section at the end which we encourage people to fill in, but you do not have to.

The consultation runs until **09 June 2022** and can be filled in by clicking on the yellow link on [this page](#).

### **Question 1. How familiar are you with the EU Pollinators Initiative?**

[Answer as you feel is correct for you, if you have read this and the information linked to in the consultation you will be at least ‘somewhat familiar’!](#)

- Very familiar
- Familiar
- Somewhat familiar

- Not very familiar
- Not at all familiar
- No opinion / Not sure

**Question 2. What importance do you assign to the EU Pollinators Initiative?**

Pollinators are crucial to the health of the environment and to future food security; wild pollinators are disappearing fast and the EC and EU Member States are in a position to take action that would reverse the decline. This is urgently needed.

- Very important
- Important
- Somewhat important
- Not important
- Not at all important
- No opinion / Not sure

**Question 3. Please indicate to what extent you agree or disagree with the following statements on the EU Pollinators Initiative:**

Broadly speaking the initiative is targeted at the right levels and has tried to achieve aims that would significantly help reduce pollinator declines. There are some significant gaps and it has not translated into action that is likely to noticeably reduce declines, particularly on pesticide use and land use change.

While neonicotinoid pesticides have been banned, the process that allowed them to be approved has not been fixed, national plans to reduce pesticide use are weak and (ironically) food security concerns are delaying EU Farm to Fork and Biodiversity Strategy commitments to cut pesticide use and pesticide harm.

The devolution of CAP payment targeting decisions to Member States seems to make it less likely that there will be a significant shift towards widespread improvements to agricultural habitats. Member States' CAP Strategic Plans need to include more positive action for safeguarding and restoring pollinator habitats.

The EC had produced good advice for local authorities and this should help urban areas, ultimately its responsibility for local delivery is limited, but it could provide grants to assist with transforming operations and areas into pollinator friendly management.

The Asian Hornet, an invasive species that preys on wild bees, has continued to spread in recent years.

|   | Strongly agree        | Agree                            | Neither agree nor disagree       | Disagree                         | Strongly disagree                | No opinion / Not sure |
|---|-----------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|-----------------------|
| The Initiative's <b>general approach</b> with regard to its objectives and actions is <b>appropriate to address the decline of pollinators.</b> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> |
| The Initiative <b>addresses all important causes of pollinator decline.</b>   | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| The Initiative's approach to tackling <b>the loss of pollinator habitats in agricultural areas</b> is adequate.                                 | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| The Initiative's approach to improving the <b>availability of habitats for pollinators in urban areas</b> is adequate.                          | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> |
| The Initiative's approach to tackling the <b>impacts of pesticide use</b> is adequate.  | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| The Initiative's approach to tackling the <b>impacts of invasive alien species</b> is adequate.   | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |

**Question 4. In your view, how well have the following actions in the EU Pollinators Initiative been implemented to date?**

The Initiative has established a good scientific basis for EU wide pollinator monitoring, but the big challenge is now to implement it in all Member States, this will require considerable support from the EC and perhaps new legislation to secure this action. Similarly, while there has been progress with assessing the EU status of hoverflies, there is an urgent need to also review the status of other groups such as moths and pollinating beetles. While the Initiative has improved data sharing, improvements to research funding and activity has been weak.

|   | Very well             | Well                             | Not well              | Not at all well                  | No opinion / Not sure |
|---|-----------------------|----------------------------------|-----------------------|----------------------------------|-----------------------|
| Action 1: Support monitoring and assessment               | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Action 2: Support research and innovation                 | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Action 3: Facilitate knowledge sharing and access to data | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> |

While the direction of travel in the Pollinators Initiative is good, when it comes to the actions in the next section the situation is unsatisfactory because it has not made a real difference to pollinator populations, therefore action and investment needs to be urgently stepped up across the EU.

The Natura 2000 network and list of species on the Habitats Directive provide only incidental protection to pollinators and this has not changed significantly (there are no species of bee listed under the Directive as requiring conservation action).

The Initiative was slow to start drafting up rescue plans for endangered pollinator species, only a couple are in preparation, and the next version of the Initiative will have to contain significantly more resources to draw up plans and to support their implementation, if it is to put in place a safety net.

It is not clear that there has been any significant increase in pollinator-relevant measures in rural development programmes or that the Commission managed to secure any meaningful integration of pollinator considerations in the implementation of the post-2020 Common Agricultural Policy.

See above question 3 for notes on pesticides and invasive alien species.

|   | Very well             | Well                  | Not well                         | Not at all well                  | No opinion / Not sure |
|---|-----------------------|-----------------------|----------------------------------|----------------------------------|-----------------------|
| *Action 4: Conserve endangered pollinator species and habitats                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| *Action 5: Improve pollinator habitats on and around farmland                 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| *Action 6: Improve pollinator habitats in urban areas and the wider landscape | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| *Action 7: Reduce the impacts of pesticide use on pollinators                 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| *Action 8: Reduce the impacts of invasive alien species on pollinators        | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |

The EC has provided guidance to, but not effectively incentivised, businesses to contribute to the conservation of pollinators.

There was no progress with applying the EU Ecolabel to products that support pollinator conservation.

The EC has produced good educational materials, including the Pollinator Park virtual reality experience.

Many Member States still lack national strategies and even countries such as the Netherlands and Germany who have plans (very comprehensive plans in the case of Germany) have been slow to implement them.

The EC has had the opportunity to promote the integration of pollinator conservation considerations and measures into international trade policy, in particular in relation to the use of bee harming pesticides on crops that are then imported into the EU. In countries neighbouring the EU this damages populations of migratory hoverflies, moths and butterflies, which would travel to the EU in the summer. However, there has been no apparent progress with extending pollinator action into the EC's international work.

|  | Very well             | Well                  | Not well                         | Not at all well       | No opinion / Not sure |
|--|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| *Action 9: Encourage the business sector and citizens to act | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

|   | Very well             | Well                  | Not well                         | Not at all well       | No opinion / Not sure |
|---|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| *Action 10: Promote pollinator strategies and collaboration at all levels | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

**Question 5. In your opinion, how well do the policies of your country or region currently address the decline of pollinators?**

In our view, no country has done well in terms of addressing pollinator declines, but if you have a national plan in place then you might want to give them credit for that action.

- Very well
- Well
- Not well
- Not at all well
- No opinion / Not sure

### Part 3. Stepping up actions for pollinators in the EU

**Question 6. In your view, how urgent is the need to protect pollinators in the EU?**

Not only do pollinator declines of around 30% per decade represent an urgent environmental crisis, it is likely to take 30 years for schemes to be developed and implemented and for the resulting habitat improvements to have matured sufficiently to create the conditions in which bees and other insects can thrive again. This work has to start now!

- Very urgent
- Urgent
- Somewhat urgent
- Not urgent
- Not urgent at all
- No opinion / Not sure

**Question 7. In your view, how much more effort is needed in the following areas, to reverse pollinator decline in the EU?**

As set out above, while good foundations have been set, in most cases delivery and implementation of the actions needed to reverse the decline of bees and pollinators has only just started.

|  | No further effort     | Significantly more effort        | A lot more effort                | No opinion / Not sure |
|--|-----------------------|----------------------------------|----------------------------------|-----------------------|
| a) Conserving the most endangered pollinator species and their habitats                        | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| b) Improving pollinator habitats in farmed landscapes  | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| c) Improving pollinator habitats in urban areas  | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| d) Integrating pollinator habitats into infrastructure networks (road, railway, power, etc.)   | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| e) Reducing the impacts of pesticide use on pollinators  | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| f) Reducing the impacts of invasive alien species on pollinators                               | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| g) Monitoring of pollinator species and assessment of their state                              | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| h) Researching pollinator decline, its causes and consequences for nature and human well-being | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| i) Engaging citizens   | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| j) Engaging businesses   | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |

**Question 8. The following threats to pollinators are currently not covered directly by the EU Pollinators Initiative. In your view, which of these, if any, should be directly addressed by the Initiative? Please select up to four priorities.**



*at most 4 choice(s)*

a) Light pollution

Light pollution has a large negative impact on insects, particularly nocturnal pollinators. Moth populations can be reduced by 50% in the vicinity of lights, and there is scientific evidence that light pollution is directly responsible for reducing pollination rates. Most Member States are not taking serious action, although Germany has a strong light pollution reduction strategy in their Insect Plan. Reducing light pollution should be added to the new Pollinators Initiative, and should be part of the Zero Pollution agenda.

b) Air pollution

Car exhaust fumes (nitrates and ozone) obscures floral scents, disrupting pollination. In addition, nitrate air pollution from agriculture and fossil fuel burning is fertilising habitats, promoting excessive vegetation growth that shades out the bare areas where bees and wasps nest and chills caterpillars so they never turn into butterflies or moths.

c) Nitrogen deposition in soil

See 'Air pollution' above.

d) Soil pollution by heavy metals

It has been established that local populations of solitary bees are reduced where the soils, and hence pollen and nectar, are contaminated with heavy metals. This is potentially an important factor, but needs more scientific work to establish how widespread and serious the impacts on pollinators are and how to fix the problem.

e) Use of biocides

Biocides are all products that deliberately kill other organisms while agricultural pesticides are already covered by the Initiative. Other biocides, such as veterinary medicines and insecticides used to treat building materials or clothes are likely to be having a significant impact on the environment. The primary impact is usually on freshwater animals as these chemicals are most abundant in waste water. There is already a process underway at ECHA to develop tests that will check toxicity of chemicals to bees and this work should continue.

f) Pathogens and parasites

Colonies of bumblebees and Honeybee queens are traded around Europe, they are often rife with parasites and diseases. In America

bee diseases imported from Europe have destroyed populations of several once widespread bumblebee species. It has been shown that disease is spreading from captive to native pollinators in Europe. Much improved biosecurity is required to minimise the risk of repeating the tragic spread of non-native insect disease that has occurred in America.

g) Climate change

Climate change is having a profound effect on pollinators. While a small number of generalist pollinator species are flourishing, a much greater number of rarer, more habitat specialised insects are going extinct in the southern parts of their range and are failing to move North. This combined effect of fragmentation, which prevents the dispersal of insects, and climate change, which is causing local extinctions is one of, if not the, biggest threat facing pollinator populations. However, while enabling pollinators to survive climate change (adaptation) is a priority habitat action (see below) preventing/minimising climate change is a pre-existing imperative, and hence not a priority for the initiative.

h) Loss of pollinator habitats in forests

The loss of open areas in woodland where pollinators can nest, lay eggs and feed on flowers is a problem for many pollinator species, but one that we would hope the Initiative would address through existing priorities - 1) improved management of Natura 2000 and other wildlife sites, 2) species recovery plans with funded projects.

i) Other (please elaborate in the open text field at the end of this question.)

Habitat connectivity is the main outcome that is missing from plans to halt pollinator decline. In recent years the evidence has become overwhelming – climate change is driving pollinator extinction in the south of species ranges, but habitat specialist species are unable to respond by moving north because the habitats are now too fragmented for effective dispersal. This is causing many species to be on a trajectory to extinction, but has also been shown to be causing a reduction in abundance, as specialist species are replaced by less efficient non-specialists. [Scientists](#) are criticising pollinator plans for the lack of habitat connectivity. We need a continent wide habitat network into which stepping stones of habitat restoration are targeted to maximise the improvements to species dispersal, otherwise vast numbers of insect species are likely to end up extinct. This is difficult to achieve, but only the EU is able to produce a joined-up habitat network plan and ensure the cross border connectivity that will be necessary if we are to halt pollinator declines. **MUST** be tackled by the initiative, we have not got another decade for waiting.

a) Light pollution

b) Air pollution

c) Nitrogen deposition in soil

d) Soil pollution by heavy metals

e) Use of biocides

f) Pathogens and parasites

g) Climate change

h) Loss of pollinator habitats in forests

i) Other (please elaborate in the open text field at the end of the questionnaire.)

- Habitat Connectivity

**Question 9. In your view, to what extent are the following tools important for efforts to reverse the decline of pollinators in the EU?**

|  | Not at all important  | Not important         | Somewhat important    | Important             | Very important                   | No opinion / Not sure |
|--|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|
| Scientifically robust EU-wide scheme for monitoring the abundance and diversity of pollinator species  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Scientifically robust EU-wide schemes for monitoring the causes of pollinator decline, such as loss of habitats, pesticides and invasive alien species | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Multi-stakeholder collaboration platforms  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Awareness-raising campaigns  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

|   | Not at all important  | Not important         | Somewhat important    | Important             | Very important                   | No opinion / Not sure |
|---|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|
| Citizen science tools   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Labelling of pollinator-friendly products (e.g. in food, gardening, horticulture, lighting solutions) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

## Final remarks

If you wish to add further information or elaborate your views on what more needs to be done in the context of actions for pollinators, please feel free to do so here.

While you do not have to fill in the free text section, please do consider personalising your response by writing something in here. You could reiterate or explain:

- Why you believe it is important that the EU acts to halt the decline of wild pollinators.
- What particular action you think is important, and outcomes you want to see.
- The need for the EC to ramp up action very urgently, to provide more funding for invertebrate conservation projects, to better resource action within the EC itself, and to make sure that the agriculture and health directorates are fully behind the Initiative.
- The need for the Member States to collaborate with EC by fully implementing the Initiative and acting coherently in other relevant policies and actions, i.e. in their Common Agricultural Policy National Strategic Plans.