

DEFRA
RECEIVED

15 MAY 2013

CCU
POST ROOM



Lord de Mauley
DEFRA
Room 625, Nobel House,
17 Smith Square
London, SW1P 3JR

10 May 2013

Dear Lord de Mauley,

NATIONAL BEE ACTION PLAN AND NEONICOTINOID INSECTICIDES

I would like to thank you for taking the time to meet us recently to discuss our campaign for a Bee Action Plan; we hugely welcome the Government's keen interest in this area. I'd also like to thank you for inviting us to your subsequent briefing for us and other NGOs on neonicotinoid insecticides.

My colleague Paul de Zylva, who attended both meetings, is looking forward to taking forward some of the more detailed discussion. But with bee numbers already in steep decline and with the poor 2012 weather and subsequent long and difficult winter for many bee species, we cannot overstate the urgency of the issue and the need for rapid comprehensive action.

We would therefore like to press you to discuss with us further the next steps we and the Government can take to further your active consideration of the holistic Bee Action Plan that's needed.

As Paul and Andrew made clear at the first meeting, we welcome much about the Government's existing work on bees. But a meaningful plan must now prioritise action and focus on all species and all causes of their decline, as we set out below.

1. The importance of bees and current work to safeguard them

Friends of the Earth welcomes the new emphasis that you are placing on the importance of all bee species including bumble bees and solitary bees and hopes to see this reflected in policy decisions in the future. As I am sure you are aware, recent research has found wild bees to be twice as effective as managed honey bees at pollinating crops and that they cannot be replaced by increasing the number of honey bees.

We do recognise the important work being done for honey bees through the **Healthy Bees Plan** to provide training and respond to pest and disease threats, but this is clearly limited in scope and does not look at the 250+ other bee species nor go much beyond the issues of disease.

We also acknowledge the valuable work of the **Insect Pollinators Initiative**, which is providing useful additional insight into the needs of our bees and other pollinators. There is always a need for more research. However we know enough already about the threats to bees and what they need for the Government and other stakeholders to take early action now and to develop longer term commitments via a Bee Action Plan.

We broadly welcome the commitments set out in **Biodiversity 2020**. But it is clear that a stepping up of effort is required. Defra's most recent update on progress on Biodiversity Indicators showed that 38 measures identified in the Strategy show either little/no change or a deterioration since 2000 compared to 17 measures showing improvement. Bee species are not specified in the list of indicators but, worryingly, indicators for butterflies are either deteriorating or are showing no improvement.

Biodiversity 2020 does not set out specific measures to help threatened bee species or to protect and restore the habitats most important to bees, which is why we believe that a Bee Action Plan would help to deliver the focussed, measurable and targeted action that is needed. Some of the most important habitats to bees such as lowland meadows remain largely unprotected by any site designation or other initiative. And worryingly Defra's latest Habitat Trend Data shows continued decline for both lowland meadows and upland hay meadows.

Habitats that are important for bees also need to be identified and protected through the **planning system**. Local plans should set out an ambition to achieve biodiversity gain in line with the NPPF. Achieving this requires the Government to set out detailed guidance to local planning authorities and set out how local plans need to reflect biodiversity policies. The forthcoming planning practice guidance on biodiversity is an excellent opportunity for this advice to be put in place. We trust that this will be issued for public consultation soon.

We also welcome the new option that you are making available under **Entry Level Stewardship** for legume and herb rich swards to benefit pollinators. But making the option available does not in itself ensure its take up by farmers. For example the Nectar Flower Mix option has only been taken up on 0.1% of the land area managed under Agri-Environment Schemes. The benefit of a Bee Action Plan would be that it could set out targets and work with stakeholders to ensure greater take up of the most beneficial options for pollinators.

We would also like to see leadership in Europe from the UK over the next two months to strengthen measures for the greening of **Pillar 1** of the Common Agricultural Policy that would benefit bees – in recent negotiations the proposals on crop diversification and Ecological Focus Areas have been weakened to a point that they will deliver little benefit to pollinators.

2. Neonicotinoid Insecticides

I do not want to enter into a detailed correspondence on Neonicotinoids as I know that you are aware of our position and have recently met with Paul and other NGOs on this issue; they made you aware of our serious concerns about your reliance on the flawed single bumble bee field trial.

Since then the Environmental Audit Committee has published its report and Friends of the Earth supports the recommendations set out by the EAC and we look forward to the Government's considered response.

There has also of course been the decision at a European level for a two-year partial moratorium on the use of three neonicotinoids pesticides. We also welcome this decision, although are disappointed that the UK Government did not support it. We are concerned to ensure farmers are supported to deal with the moratorium and the reduction in pesticide use required under the Sustainable Use Directive. A Bee Action Plan should include measures to this effect.

3. Next Steps and Bee Action Plan

We remain convinced that the best next step that you could take would be to commit to developing a Bee Action Plan with key stakeholders. We recently warmly welcomed the Welsh Government's draft Action Plan for Pollinators which sets out measures to help all bee species and across all policy areas including farming, conservation and planning.

I hope that you will join us at our Bee Summit in June – to which we will invite all key stakeholders – as an ideal opportunity to start the process towards a Bee Action Plan; drawing on the contacts we have gathered from across civil society who want to play their role in ending bee decline. In the meantime, please could you set out for us the process by which you envisage the Government will draw-up and implement a holistic action plan of the sort you referred to when we met?

Yours sincerely,



Andy Atkins
Executive Director, Friends of the Earth