



Apiservices *Aurelia*
ES LEBE DIE BIENE



Badenoch & Strathspey
Conservation Group



euRONATUR



Plantlife

POLLINIS



Frans Timmermans
European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

30 January 2020

Dear *Frans*

Re. EP resolution of 18 December 2019 on the EU Pollinators Initiative (2019/2803(RSP))

We note the passing of the above substantive, pertinent and salient [motion](#) by the European Parliament covering progress with the Pollinators Initiative and outstanding challenges to rectifying the dreadful declines in bees, hoverflies, moths, butterflies and other insects in the EU.

Recent EU Red Data List assessments revealed that about 9% of insect species in the EU are threatened with extinction, and in December the updated [EU Grassland Butterflies Index](#) showed that there has been a shocking 39% decline in EU butterfly numbers in the last 30 years.

A [letter](#) published by Nature this month from 70 scientists (Harvey et al. 2020) states that *“There is now a strong scientific consensus that the decline of insects, other arthropods and biodiversity as a whole, is a very real and serious threat that society must urgently address”*.

We are supportive of the EP resolution and believe that the EC should meet the challenge and move with alacrity to scale up action to halt the loss of invertebrate biodiversity.

Firstly, action is required to secure the space that insects need to thrive, this includes doing better at safeguarding and managing the surviving rich grassland habitats, adding features that provide resources for pollinators, whole-field wildflower restoration to create pollinator corridors, and landscape scale transformations to restore vibrant wild ecosystems. Secondly, these spaces need to be made safe from harmful pollutants and other agents. Thirdly, effort needs to focus on improving our knowledge of pollinators and the relationships that we have with them.

Solutions to the dramatic losses of invertebrates must also be fully factored into EU 2030 Biodiversity Strategy, which must:

- 1) Fully incorporate *a)* the EU Pollinators Initiative, with improvements based on subsequent science and evidence, *b)* this EP motion, and *c)* these recommendations from NGO experts (which include specific proposals relating to bringing the CAP outside), see link below;
- 2) Feature legally enforceable and measurable targets, with their delivery firmly embedded across EC functions; and
- 3) Include specific targets for restoring insect populations, for establishing a functioning network of wildflower habitat rich corridors, and for reducing pesticide use and levels of artificial light pollution.

Monitoring progress will be crucially important; here the Habitats Directive Article 17 reporting data and favourable reference values could set a baseline and target for restoring good conservation status for Natura 2000 grasslands. The EU grassland butterfly indicator is a pertinent metric; long term trends are published and data will be reported from most MSs by the end 2020. The development of an overall EU pollinator population metric using standardised techniques and incorporating pollinator diversity, abundance, economics and foodplants should be a key output of the planned EU Expert Group when developing a pollinator monitoring framework.

Halting biodiversity loss, as with developing the circular economy, is dependent on it being a cross-directorate priority. Strong mainstreaming of biodiversity into sectoral policies is needed to tackle the underlying drivers of pollinator decline, including intensive agriculture, pesticide use and land use change.

However, in the absence of a renewed political drive from the European Commission, the ongoing reform of Common Agricultural Policy will fail to provide a positive vision for pollinators, let alone the resources to restore a coherent network of wildflower-rich habitats. It is important to clearly emphasise that wild pollinators provide the bulk of pollination services and are in greatest peril. Pollinator actions proposed in the current reform seem to be targeted only at helping honeybee keepers, rather than retaining and restoring a functioning agroecosystem.

At a member state level there will have to be unblinking attention to targeting pollinator actions in their CAP Strategic Plans if there is to be a significant improvement to EU wild pollinator populations before 2027.

In the case of pesticides, we are very concerned by the failure to evolve the chemical and use authorisation system to protect managed and wild pollinators and to reduce the likelihood of a repetition of the neonicotinoid disaster. Our fear is that the current review of the EFSA 2013 Bee guidance will lower the scientific trigger points to the extent that our faith in the current model of pesticide harm avoidance is extinguished.

The European Green Deal and the announced Farm to Fork strategy are opportunities the Commission must boldly use to solve the issue of pollinator and insect decline in a holistic way, with active contributions from the different DG's involved (mainly ENVI, AGRI, SANTE): while improvements to biosecurity of soil and live plant importation, and the greening of trade, will require the dedicated engagement of DG TRADE.

Business as usual will not deliver and we are running out of time to move Europe off the current path which will lead to an existential ecological and climate crisis within the lifetime of our children.

We count on you to give your attention to ensuring that preventing the loss of wild pollinators is firmly addressed across the European Commission.

We would be happy to meet with you or your staff to discuss how this agenda can be advanced.

Yours sincerely



Matt Shardlow
CEO – Buglife - the Invertebrate Conservation Trust

cc. Virginijus Sinkevicius
Stella Kyriakides
Janusz Wojciechowski
Pascal Canfin

On behalf of:



Dafydd Lewis
Hon. Secretary, Amateur Entomologists'
Society.



Gilles Ratia
President, Apiservices



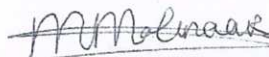
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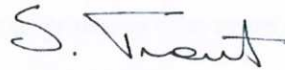
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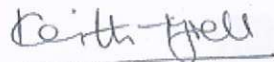
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Française.



James Robinson
Director of Conservation, Wildfowl &
Wetlands Trust

EU Parliament motion - https://www.europarl.europa.eu/doceo/document/TA-9-2019-0104_EN.html

Butterfly Indicator – Technical report - [https://butterfly-monitoring.net/sites/default/files/Publications/Technical%20report%20EU%20Grassland%20indicator%201990-2017%20June%202019%20v4%20\(3\).pdf](https://butterfly-monitoring.net/sites/default/files/Publications/Technical%20report%20EU%20Grassland%20indicator%201990-2017%20June%202019%20v4%20(3).pdf)

Action letter from scientists - <https://www.nature.com/articles/s41559-019-1079-8>

Detailed NGO recommendations - http://www.ceeweb.org/wp-content/uploads/2011/12/2018_03_29_EHF-Pollinator-Initiative.pdf

