

Response to the public consultation on the All-Ireland Pollinator Plan

May 2015

This is a response to the public consultation phase, where feedback was accepted through a dedicated survey monkey form between the 1st February and the 1st March 2015. A total of 37 responses were received.

Feedback on the draft pollinator Plan was also received during the pollinator symposium held at WIT on the 17th February 2015. A separate stakeholder engagement process was carried out in parallel to the public consultation phase (beginning February – end March 2015). A total of 70 organisations were individually contacted and given the opportunity to feed into the Plan.

Feedback from the public consultation

Interested parties were given the opportunity to respond to a total of 12 questions. Questions 3-10 referred to existing sections of the draft Plan. Question 11 provided an opportunity for any other comments. For those not confident that the draft Plan will achieve success over the next 5 years, question 12 provided an opportunity for respondents to provide examples of the actions they would like to see included.

Under question 1, 100% of people were supportive of developing an All-Ireland Pollinator Plan. Under question 2 the Plan scored an average of 3 out of 5 in terms of how confident the respondents were, that over the next five years, this Plan will build a solid foundation to bring about a landscape where pollinators can flourish (1= not confident, 5=very confident).

The majority of feedback received on the Plan was extremely constructive. Some responses refer to the implementation and these will be used within that phase.

Within the 2015-2020 Plan progress will be clearly measured and documented but we have deliberately not set SMART targets. It is about coming together and achieving as much as we can by working strategically and cohesively within existing frameworks. It is a voluntary Plan, with organisations and individuals assuming responsibility for their own actions. It is hoped that as much progress will be made as individual situations allow. This five year Plan is not static and will continually evolve to be as effective as possible. If situations arise where setting a defined target is likely to act as a stimulus and encourage further action this can be explored.

This response document comments on the feedback received under each of the questions posed. There is overlap in terms of the feedback received under each question.

Q3. Do you have suggestions or comments on the background information (pages 3 to 9) provided in the draft pollinator plan?

Twenty five responses were received to Q3.

While a small number of people felt the document was too technical, the overwhelming opinion was that it provided the right level of information. Where areas of potential misunderstanding were identified in the text, these have been addressed in the revised version.

A number of people felt that there wasn't enough engagement with other stakeholders (bee keeping associations, farming groups etc.). A separate stakeholder engagement process was carried out in parallel to the public consultation phase (beginning February – end March 2015). A total of 70 organisations have been individually contacted and given the opportunity to feed into the Plan.

A number of respondents felt there should be more emphasis on other insect groups as pollinator's (butterflies, moths, wasps etc.). Evidence suggests that these groups do not contribute significantly to crop pollination in Europe, despite being abundant and often frequent flower visitors. Bees are also the predominant pollinator of wild plants, but the role of other insects has been better recognised in the revised Plan.

The following are the main changes that have been incorporated in light of feedback received:

- More information has been provided on wild pollinators in terms of their nesting and forage requirements, and the habitats in which they are found.
- More information has been provided on the impact of climate change on pollinators.
- The paragraph on pesticides has been expanded slightly. The term has also been clarified to explain it refers to insecticides, herbicides and fungicides.
- Greater care has been given to stress that pollinators (while they do have a monetary value) cannot in reality be replaced.
- The paragraph providing the two options has been revised and clarified, as it was correctly pointed out that these are two ends of a spectrum.
- Health has been changed to 'health and well-being' and expanded slightly.
- One respondent correctly pointed out that the document was giving the false impression that providing artificial nesting habitat was more important than it actually is. The emphasis has been changed to better stress the preference for maintaining natural nesting habitat and forage sources within the landscape.

Q4. Do you have suggestions or comments on the targets and actions in this section: Making Ireland Pollinator Friendly: farmland?

30 responses were received to Q4.

Some comments expressed criticism of the Department of Agriculture and existing initiatives. In the main, the feedback was extremely constructive.

A number of people felt that there wasn't enough engagement with other stakeholders. A separate stakeholder engagement process was carried out in parallel to the public consultation phase (beginning February – end March 2015). A total of 70 organisations have been individually contacted and given the opportunity to feed into the Plan. These included the IFA, Macra na Feirme, UFA, the Soft fruit growers association & the Horse farming sector.

The following are the main issues raised, with all being incorporated into the revised version where possible.

Communication. The pollinator message should be communicated to farmers in an effective way that will reach as many as possible with the farming community.

Stakeholder engagement. Much more engagement with the farming community is required. While all sectors were invited to comment on the draft Plan this has not proven effective. It is proposed that a subgroup on farming is set up to contain representatives from across the sector to properly engage on pollinators over the coming years (this has been added as an action in the revised Plan).

Hedgerows. Many respondents pointed out the importance of good quality hedgerows as a pollinator habitat within the farmed landscape. This is recognised and emphasised in the revised Plan.

Promote positives. The positive actions that are being taken with the sector as well as by individuals should be recognised.

Reference sites. It was strongly felt that reference sites where pollinator friendly management can be observed in reality would be very useful. These should be accessible and available in a training capacity.

Clear information on what actions to take. It was stressed that information on what actions to take should be clear, straightforward and unambiguous. It is proposed that a series of clear 'how to guides' be created.

Cost benefit analyses. It was felt that it would be very useful to have data for farmers on the cost benefits of different management options. This has been added to the research actions.

Training courses. The provision of training courses (for farmers or farm advisors) on pollinators and pollinator friendly management practices should be explored.

Herbicides. It was felt that the impact of herbicides on reducing flowering plants within the farmed landscape was not stressed enough.

Innovation and ideas to promote flowers within farmed landscape. A number of respondents suggested innovative ways to promote flowers within the farmed landscape. During implementation these will be passed to the subgroup set up to deal with funding and innovation.

Voluntary actions. Additional actions and edits were suggested to the list of voluntary pollinator friendly actions that could be taken by farmers. These have been incorporated where appropriate.

Q5. Do you have suggestions or comments on the targets and actions in this section: Making Ireland Pollinator Friendly: public land?

27 responses were received to question 5. Some responses refer to the implementation of the Plan and will be retained for consideration in that phase.

A number of people felt that there wasn't enough engagement with other stakeholders. A separate stakeholder engagement process was carried out in parallel to the public consultation phase (beginning February – end March 2015). A total of 70 organisations have been individually contacted and given the opportunity to feed into the Plan.

The following are the main issues raised, with all being incorporated into the revised version where possible.

Reference sites. It was strongly felt that reference sites where pollinator friendly management can be observed in reality would be very useful. These should be accessible and available in a training capacity. This has been added as an action.

Case studies. In addition to reference sites, case studies should also be made available. These should be pragmatic and realistic. This has been added as an action.

Local seed. While natural regeneration is preferable, where wildflower seed is necessary for habitat restoration work (wild flower meadow, road side verge) this should be local provenance if possible. It is suggested that training in the collection, storage and use of locally collected seed be explored. This has been added as an action.

Education and communication. Effective communication to a public more comfortable with a neat and tidy approach to the management of public land is crucial. The best ways to achieve this should be explored. When it comes to education and 'educate the educators' approach should be used.

Hedgerows. Many respondents pointed out the importance of good quality hedgerows as a pollinator habitat. This is recognised and emphasised in the revised Plan.

Clear information on what actions to take. It was stressed that information on what actions to take should be clear, straightforward and unambiguous. It is proposed that a series of clear 'how to guides' be created.

Training courses. The provision of training courses (for all land managers) on pollinators and pollinator friendly management practices should be explored.

Promote positives. The positive actions that are being taken by individual sites should be recognised. Certification was suggested as a possible means of recognition. This will be explored during the implementation phase.

Cost benefit analysis. It was felt that it would be very useful to have data for land managers on the cost benefits of different management options (e.g, weekly mowing and spraying regime versus cutting and removing grass twice a year). This has been added to the research actions.

Document confusing in terms of responsibility. Organisations who have volunteered to accept responsibility are stated in the Plan, but it was pointed out that it should be stressed that in all cases there is scope and space for others to get involved and play a role in delivery. The revised Plan has been edited accordingly.

Pollinator actions should be incorporated into county/city biodiversity plans & county development plans where appropriate. This has been suggested as an action in the revised Plan

Other landholders. It was suggested that other landholders be approached with regard to pollinator friendly management e.g., church land, sports grounds. This has been added as an action.

Mechanism for local involvement. It was suggested that a mechanism should be created for local groups to identify areas they feel would be suitable for management as future pollinator habitats (roadsides etc.) This has been retained for consideration during the implementation phase.

Pesticides. Some respondents called for a full ban on the use of pesticides. The Pollinator Plan supports the National Action Plan for the Sustainable Use of Pesticides (2013).

Q6. Do you have suggestions or comments on the targets and actions in this section: Making Ireland Pollinator Friendly: private land?

23 responses were received to question 5. Some responses refer to the implementation of the Plan and will be retained for consideration in that phase.

A number of people felt that there wasn't enough engagement with other stakeholders. A separate stakeholder engagement process was carried out in parallel to the public consultation phase (beginning February – end March 2015). A total of 70 organisations have been individually contacted and given the opportunity to feed into the Plan.

The following are the main issues raised, with all being incorporated into the revised version where possible:

Case studies. Case studies should be made available. These should be pragmatic and realistic. This has been added as an action.

Business target too low. The initial target of getting 5 business to agree to make their premises pollinator friendly was widely recognised as too low. It has been increased to 60 in the revised Plan.

Other groups. It was suggested that other groups be approached with regard to pollinator friendly management e.g., church land, car parks of retail outlets. This has been added as an action.

Garden Centres. The Plan should engage with the Garden Centre sector. This has been added as an action

Clear information on what actions to take. It was stressed that information on what actions to take should be clear, straightforward and unambiguous. It is proposed that a series of clear 'how to guides' be created.

Sponsorship, national initiatives, celebrity champions. These were all suggested as ways to get the public involved in the Pollinator Plan. These will be discussed by the subgroup set up to deal with funding and innovation.

Local seed. Where members of the public want to plant wildflowers in their garden this should be local provenance if possible. It is suggested that training courses in the collection, storage and use of locally collected seed be explored. This has been added as an action.

Education and communication. Effective communication to a public more comfortable with a neat and tidy approach to private land is crucial. The best ways to achieve this should be explored.

Pesticides. Some respondents called for a full ban on the use of pesticides. The Pollinator Plan supports the National Action Plan for the Sustainable Use of Pesticides (2013).

Q7. Do you have suggestions or comments on the targets and actions in this section: Raising awareness of pollinators and how to protect them?

19 responses were received to question 7. The following are the main issues raised, with all being incorporated into the revised version where possible:

NGO involvement in education and training. It was suggested that it be explored whether there are areas of public land that can be used by environmental NGOs to create examples of pollinator friendly management that can be used for education and training.

Sponsorship, national initiatives, and celebrity champions. These were all suggested as ways to get the public involved in the Pollinator Plan. These will be discussed by the subgroup set up to deal with funding and innovation.

Media coverage. It was suggested professional media coverage is necessary to promote the Plan.

Training courses. The provision of training courses (for all land managers) on pollinators and pollinator friendly management practices should be explored.

Garden Centres. Engagement with this sector should be explored with a view to Garden Centres communicating information on pollinator friendly plants.

Clear information on what actions to take. It was stressed that information on what actions to take should be clear, straightforward and unambiguous. It is proposed that a series of clear 'how to guides' be created. These should be disseminated effectively.

Other sectors. It was suggested there be more engagement with other sectors who could spread the pollinator message e.g., Ecological Consultants, Heritage in Schools programme.

Social media. More use should be made of social media (tweets, blogs, video) to promote and communicate the Plan.

Q8. Do you have suggestions or comments on the targets and actions in this section: Managed pollinators – supporting beekeepers?

19 responses were received to question 8.

The bee keeping associations (FIBKA, UBKA, NIHBS, INIB) were contacted separately as part of the wider stakeholder engagement process and provided feedback directly.

The following are the main issues raised, with all being incorporated into the revised version where possible and appropriate:

Regulation of imported honeybees and bumblebees: this was repeatedly stressed as an area of importance.

Importance of maintaining hive numbers: this was stressed separately as a means of both restricting hive numbers in areas where rare wild bee species are present; and also increasing bee keeping activity to improve pollination service where hive numbers are low.

Better education on pollinators: some respondents raised the issue that some new entrants into beekeeping have taken it up because of a perceived benefit to local pollinator populations. Given the skill and expertise required for healthy beekeeping, they suggested that education programmes be run to show them that they could also benefit local pollinator populations by planting choices in their gardens, reduced mowing regimes on lawns etc.

Education & research: It was suggested that there is currently a lack of straight forward advice in the Irish beekeeping world in relation to disease management, application of treatments and the efficacy of certain treatments. And that this is because frequently bee medication is not tested under Irish field conditions, leading to adverse effects and colony losses. Research should be stimulated on testing certain treatments, certain management practices and to educate beekeepers on proper treatment and management of their colonies under Irish conditions. Additional honeybee research actions have been added to the revised Plan.

Centralised education and inspection body set up by DAFM. This was raised as a need, and should incorporate a regional disease diagnostic service, similar to the service offered by the Regional Veterinary Laboratories. This would provide a framework for an early alert system in the case of introduction of exotic diseases and will also help regulate bee movements around the country.

Small hive beetle: the need for vigilance and an early alert system (above) to deal with the potential arrival of future diseases such as the small hive beetle (currently in Italy) was raised.

Q9. Do you have suggestions or comments on the targets and actions in this section: Making sure we're doing the right thing?

12 responses were received to question 9. The following are the main issues raised, with all being incorporated into the revised version where appropriate:

Use of native Irish products: in the context of doing the right thing, the need for a quality standard to ensure the availability of high quality native origin seed for wild flower planting schemes was raised.

Open engagement: open and honest engagement that looks for and accepts feedback from the public should continue.

Additional research areas suggested: Understand the impact of bees imported from abroad on local populations of pollinators. Measure the mortality rates of imported bees. Measure the KPIs of local populations co-located with imported bees compared with those not close to imports. Compare productivity and docility of imports against local populations. Determine the best-suited species for the Irish environment. Compare the KPIs various honeybee species used in Ireland. The Key Performance Indicators should include productivity, resistance to disease, docility and mortality. Additional research actions on honeybees have been incorporated into the revised Plan.

Q10. Do you have suggestions or comments on the targets and actions in this section: Collecting evidence to track change and measure success?

16 responses were received to question 10. The following are the main issues raised, with all being incorporated into the revised version where possible:

Baseline studies and monitoring: it was repeatedly stressed that this is essential to determine the impacts of management changes to measure success of the Plan. Widespread participation in the Bumblebee Monitoring Scheme should be encouraged and supported by training and resources. Attempts have been made to integrate this more fully into the revised Plan.

Garden Pollinator Survey: a pollinator scheme similar to the Garden Bird Scheme was suggested. Given the levels of training that would be required this would be heavy on resources and would require funding. At present it is proposed to focus on the bumblebee monitoring scheme as a means of measuring changes in wild pollinator populations through the life of the Plan. However, a garden survey will be further investigated during the implementation phase as it would have huge value in terms of awareness raising.

Clearer communication: It was suggested that some of the actions in the Plan should be clearer in terms of what will be achieved. The Plan has been edited to try and reflect this.

Q11 Do you have any other comments you would like to make regarding the draft All-Ireland Pollinator Plan 2015-2020?

21 responses were received to question 11.

A number of people felt that there wasn't enough engagement with other stakeholders. A separate stakeholder engagement process was carried out in parallel to the public consultation phase (beginning February – end March 2015). A total of 70 organisations have been individually contacted and given the opportunity to feed into the Plan.

The following are the main issues raised, with all being incorporated into the revised version where possible:

Section on funding: The plan should include a section on funding opportunities over the next five years and what plans are in place to obtain funding. Which bodies will put in applications? Who will collaborate? What aims will funding address? This has been added as an action.

Legislative power: some respondents felt that the Plan needs legislative power. This version of the Pollinator Plan is about coming together and achieving as much as we can by working strategically and cohesively within existing frameworks.

Action to renew Plan: it was suggested that there should be a specific action to renew the Plan in 2020. This has been added.

Document confusing in terms of responsibility. Organisations who have volunteered to accept responsibility are stated in the Plan, but it was pointed out that it should be stressed that in all cases there is scope and space for others to get involved and play a role in delivery. This Plan has been edited to reflect this.

Clearer indication of what success will look like: Success will be measured both in terms of the number of individual site based actions that are taken; and by changes in the abundance of wild and healthy managed pollinators in the landscape. Mechanisms to capture both these data streams will be established. The Plan has been revised in an attempt to clarify this.

Overdue: One respondent had the understandable reaction that the Plan was long overdue. However, the timing was chosen to coincide with sufficient public perception of the pollinator problem and sufficient evidence based studies from around the world to be able to confidently identify actions that will have a high likelihood of success.

Q12 If you are not confident that this plan will achieve success over the next 5 years, please provide examples of the actions you would like to see included.

16 responses were received to question 12.

A number of people felt that there wasn't enough engagement with other stakeholders. A separate stakeholder engagement process was carried out in parallel to the public consultation phase (beginning February – end March 2015). A total of 70 organisations have been individually contacted and given the opportunity to feed into the Plan.

The following are the main issues raised, with all being incorporated into the revised version where possible:

Section on funding: The plan should include a section on funding opportunities over the next five years and what plans are in place to obtain funding. Which bodies will put in applications? Who will collaborate? What aims will funding address? This has been added as an action.

More emphasis on getting government buy in: this will be addressed during the implementation phase of the Plan.

Use of reference sites and cases studies: development of these have been incorporated into the revised Plan.

More measurable outcomes: Within the 2015-2020 Plan progress will be clearly measured and documented but we have deliberately not set SMART targets. It is about coming together and achieving as much as we can be working strategically and cohesively within existing frameworks. It is a voluntary Plan, with organisations and individuals assuming responsibility for their own actions. It is hoped that as much progress will be made as individual situations allow. This five year Plan is not static and will continually evolve to be as effective as possible. If situations arise where setting a defined target is likely to act as a stimulus and encourage further action this can be explored.

Dissemination task should be run by professional PR/advertising experts: Agreed, but without funding it is difficult to implement this.

Thanks to those who contributed to the public consultation process

The Steering Group extends its sincere thanks to all those who engaged with the document and provided feedback on the All-Ireland Pollinator Plan 2015-2020. We greatly appreciate the large amount of constructive feedback received.