

Implementing *Biodiversity2020: A strategy for England's wildlife and ecosystem services*

A report from Wildlife and Countryside Link

Wildlife and Countryside Link (Link) has produced this report in response to publication of the new biodiversity strategy for England - *Biodiversity2020: A strategy for England's wildlife and ecosystem services*. The conservation of biodiversity in England is integral to the aims of Link and its members; collectively we have a vast range of experience and expertise in delivering for species, habitats and ecosystems therefore this national strategy is of critical importance to Link. In this critique we make detailed suggestions for delivery to achieve the biodiversity outcomes set out in the strategy.

This report is supported by the following 15 organisations;

- Amphibian and Reptile Conservation
- Bat Conservation Trust
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation
- The Grasslands Trust
- The Mammal Society
- People's Trust for Endangered Species
- Plantlife
- The Rivers Trust
- Royal Society for the Protection of Birds
- Salmon & Trout Association
- Wildfowl & Wetlands Trust
- The Wildlife Trusts
- Woodland Trust
- WWF- UK

Along with the proposed outcomes within *Biodiversity2020*, we welcome in principle the four themes; however, a fifth theme of '*Government leading by example*' would also have been welcomed. Our concerns principally relate to the implementation of the ambitions of *Biodiversity2020*, delivery of which requires:

- good governance, including cross-departmental and inter-agency commitment to secure biodiversity gains, and genuine engagement with Non-Governmental Organisation (NGO) partners in decision-making on priorities;
- a funding plan for the long-term;
- a clear delivery plan;
- a baseline of species, habitat and landscape status against which to measure success;
- putting priority species needs central to habitat and landscape initiatives;
- using regulation and legislation where voluntary measures fail; and
- linking local delivery to a robust national framework of information and advice.

Overarching comments

- **General inertia.**

Overall, Link is disappointed that despite a series of delays in the strategy's publication following the Natural Environment White Paper, *Biodiversity2020* did not include any further tangible commitments or ambitions beyond those already published. Link is also concerned that beyond the Nature Improvement Areas and Local Nature Partnerships¹ announced in the White Paper, further detail and delivery is being delayed until the publication of a delivery plan in March 2012. Since the BAP review in 2005 there has been considerable work undertaken at local, regional and national levels to describe biodiversity opportunities and actions required across England – this body of work should be utilised by Natural England as part of the evidence base for the *Biodiversity2020* delivery plan.

- **Species outcome falls short.**

The outcomes expressed for species are inadequate and should be better defined. Outcome 3 “*by 2020 we will see an overall improvement in the status of our wildlife and will have prevented further human induced extinctions of known threatened species*” falls below the ambition of Target 12 of the Convention of Biological Diversity's (CBD) Strategic Plan which includes “*conservation status, particularly of those [species] most in decline, has been improved and sustained.*”² *Biodiversity2020* does not appear to commit to halting declines in our most threatened species. Outcome 3 could actually be achieved by a general increase in some already common species alongside a continuing decline in our rare and threatened species so long as a single population remains and therefore extinction technically avoided. Link hopes that this was not the intention and that the detail of outcome 3 and our collective ambition for species in England will be clarified in the text of the delivery plan.

- **Less ambitious than EU**

Equally, whilst many of the other commitments in *Biodiversity2020* are the same as the global commitments from the CBD, it is worrying that a decision has been taken to ignore where the European Biodiversity Strategy was more ambitious. For example, *Biodiversity2020* calls for sustainable harvesting of fish by 2020 when the EU target is sustainable fisheries by 2015. The EU biodiversity target included the wording “*halting the loss of biodiversity and the degradation of ecosystem services in the EU by 2020, and restoring them in so far as feasible*” but England's mission only mentions biodiversity loss and not restoration. *Biodiversity2020* also omits reference or acknowledgment of the EU Birds and Habitats Directives. This signals that the Government is not signed up to the direction of Europe. ***Did the Government intentionally exclude reference to EU Birds and Habitats directive with the knowledge that a review of the implementation of these Directives would be upon us?***

- **Learning from past experiences**

The period 2008-2010 saw a re-jig of the biodiversity process and structures in England, including revised expert groups for species and habitats. Considerable

¹ Local Nature Partnerships: Delivering for Nature – a report by Wildlife and Countryside Link (insert Link) http://www.wcl.org.uk/docs/Link%20report_LNPs_delivering%20for%20nature_021211.pdf

work was undertaken by these groups to gather information, where available, on the location and needs of Section 41 (s41) species and habitats, as well as to outline gaps in our knowledge which were a priority to fill. At the same time there was much discussion about lessons to be learnt, including the need for better communication of technical expertise and solutions through to policy forums that could ease barriers to progress. *Biodiversity2020* appears not to build on this body of work and it is a concern to Link that Government is starting with a clean sheet rather than building on success and known solutions, or at least learning from past mistakes.

- **Government should be leading by example**

Biodiversity2020 does not outline how the delivery of species, habitat and ecosystem outcomes will be actioned across Government. Similarly, there is a sense that much of the delivery will be done by civil society, yet civil society remains largely excluded from setting the ambition and priorities. All Government activity should be tested against the *Biodiversity2020* outcomes.

- **Voluntary initiatives need a robust framework**

We recognise the Government's desire to use voluntary approaches and to support a culture of responsibility rather than excessive regulation. However, a clear, robust framework is needed to guide voluntary initiatives, setting out what they must achieve and how, and at what point regulations will be adopted if voluntary approaches are shown not to be working.

Case study: Wildlife & Water – what *Biodiversity2020* lacks and the delivery plan must address:

- *Biodiversity2020* covers a random assortment of existing water and wetland commitments. It does not properly align water and biodiversity policy and so fails to specify actions that would lead to the delivery of biodiversity through water policy mechanisms and funding strands. For example, you can have a clean river with 'good ecological status' without delivering significant biodiversity benefits.
- The delivery plan must broadly re-think integrating biodiversity delivery from water policy by:
 - a) interpreting it much more broadly, to include wider water and ecosystems management, drainage, risk management.
 - b) understand how existing water policy frameworks, including the Water Framework Directive, River Basin Management Plans, catchment management, Water Protection Zones and Special Protection Areas relate to the delivery of biodiversity outcomes.
 - c) In aligning action for water and biodiversity, the delivery plan must specifically recognise the need for greater water quality (reducing diffuse pollution) and water quantity (allowing natural flow regimes and link to groundwater recharge, wetlands and healthy soils) to enhance biodiversity.
- Most well-designed schemes should, offer both wildlife and water outcomes; and these schemes should be resourced to do so. Nonetheless, schemes that do not offer double benefits should not be discounted for that reason.

Outcome 1 – habitats and ecosystems on land

1A – better wildlife habitats with 90% of priority habitats in favourable recovering and at least 50% of SSSIs in favourable condition, whilst maintain at least 95% in favourable or recovering condition;

Link very much welcomes the ambition to move sites in the SSSI network into truly favourable condition, building on the SSSI 2010 achievement whereby over 90% of the area of SSSIs came into at least 'favourable recovering' condition. It is notable that the previous SSSI network success was driven by a strong Government target, which in turn facilitated the commitment of statutory agencies and departments, and was crucially backed with the additional resources needed to achieve positive results.

Link's suggestions for delivery

- Natural England should, as a priority, establish a definitive England habitat inventory to use as the baseline of habitat extent and quality for England. This should utilise existing information (e.g. ancient woodlands) so that progress against this target can be assessed.
- A simpler way of adequately defining priority habitats should be outlined, along with a clear understanding of how to measure the condition of priority habitat.
- Natural England/Defra should develop and implement a plan to identify and fill the gaps in this baseline of habitat extent and quality by 2014.
- Government should seek to more efficiently use existing statutory monitoring, such as that on protected sites, to measure progress on priority habitats. At the very least there must be a coordinated programme for assessing progress against this outcome in the delivery plan.
- The Terrestrial Biodiversity Group (TBG) should identify the remedies required to bring non-SSSI habitats into favourable/recovering condition and these should be prioritised to deliver the most for priority (s41) species. There are opportunities with the ongoing SSSI notification and designation projects within Natural England and Link would welcome an opportunity to contribute to these processes to help ensure that protected sites deliver the most they can for priority species and habitats.
- Alongside SSSIs, Local Wildlife Sites play an important role in wildlife protection and as nodes for ecological restoration. Link believes the details of how Government will encourage local authorities to better manage and report on Local Wildlife Sites should be part of the delivery plan.

1B – more, bigger and less fragmented areas for wildlife, with no net loss of priority habitats and an increase in the overall extent of priority habitats by at least 200,000 ha

Bringing the SSSI ambition together with those for improving priority habitat condition and restoring or creating new priority habitat is the right approach to move us forward towards considering ecological networks as outlined in the *Making Space for Nature* report, and as such this is also welcomed by Link. The detail of how habitat condition is defined, as well as breaking down the 200,000 hectare target into priority habitat types, are essential for ensuring this action contributes towards halting the loss of priority species.

Link's suggestions for delivery

- There must be a firm commitment which acknowledges that *no net loss* of irreplaceable habitats means no loss of existing habitat (i.e. some habitats cannot

be lost and simply recreated). It is important for the biodiversity offsets initiative to recognise and embrace the distinction.

- Natural England should develop and communicate a clear metric which describes how fragmentation is reduced through delivery of the *Biodiversity2020*.
- In early 2012, Natural England /Defra should produce an analysis of what has been achieved towards increasing priority habitats in the last five years, which schemes and initiatives have been responsible for the increases and what the blockages to more delivery have been. By early 2012, Natural England should establish a usable spatially referenced system for recording the (re)creation of priority habitats.
- By early 2012 Natural England /TBG should assess which habitats have declined the most since Rio in 1992 and which habitats would deliver most for priority (s41) species.
- Government's commitment to an increase in 200,000 hectares of priority habitat should be defined in terms of the variety of habitats involved, and a definition of the quality of habitat restoration and creation which can legitimately be counted against this outcome. In 2012, specific milestones for the increase in extent of those priority habitats identified above should be published.

1C – By 2020, 17% land and inland water especially areas of particular importance for biodiversity and ecosystem services, conserved through effective, integrated and joined approaches to safeguard biodiversity and ecosystem services including through management of our existing systems of protected areas and the establishment of nature improvement areas;

Restoring degraded ecosystems and seeking to improve the delivery of ecosystem services provide contextual support for the need to increase the pace and scale at which species populations and habitats are restored.

Link's suggestions for delivery

- We need absolute clarity on what we mean by 'ecosystem services' in this outcome and which or what combination exactly we want to see restored with a spatial explanation of and reference point for.
- The contribution of protected areas being measured and how protection being defined in respect of achieving the 17% target should be explained by Government.
- Defra and CLG should work together to outline precisely how local planning will support Nature Improvement Areas (NIAs).
- The National Planning Policy Framework's (NPPF) presumption in favour of sustainable development must be re-worded and changes are also needed to the natural environment policies, as Link has suggested in its response on the NPPF³.
- NIAs represent an opportunity to undertake essential landscape scale conservation to deliver positive results for our most vulnerable wildlife and therefore the needs of Section 41 priority species and habitats should be central to this delivery.
- It is imperative that NIAs link into a national framework of information and advice. This will ensure those areas identified locally with the greatest need and opportunity become NIAs and deliver the best results.

³ http://www.wcl.org.uk/docs/2011/Link_response_to_NPPF_consultation_171011.pdf

- Defra should carefully consider whether or not catchment pilots are or should be NIAs and articulate the relationship between the two.
- Government should encourage research into the biodiversity impacts of flooding and coastal erosion.
- Lessons must be learnt from ongoing landscape scale conservation and ecological restoration projects. We suggest that priority is given to collating information on successful ways of working and, in particular, examples of solutions to known barriers to progress.

1D – restoring at least 15% of degraded ecosystems as a contribution to climate change mitigation and adaptation

Whilst we welcome a target to restore degraded ecosystems we note that this goes no further than Aichi target 15. Even if this target is achieved it will leave 85% of degraded ecosystems still degraded by 2020. This suggests that a largely degraded environment is the extent of our ambition. We believe that it is vital that work to restore ecosystems against this outcome is designed to maximise the benefits for priority species and habitats as well as contribute to climate change mitigation and adaptation.

Link's suggestions for delivery

- Priority species and habitats should be used to prioritise the restoration of degraded ecosystem as part of an integrated approach.
- The workstreams previously under the England Biodiversity Group should have listed known threats and proposed solutions for each sector (e.g. agriculture, forestry, water). These should be brought forward with proposed actions in the delivery plan for 2012-2015.
- The action relating to reducing air pollution fails to mention carbon dioxide, one of the most important polluting gases. Defra and DECC should be working together to outline the relationship in terms of respective department activities between tackling climate change emissions and taking land management action to safeguard the natural environment. The delivery plan should outline how DECC policies will generally deliver for biodiversity.
- Improving environmental outcomes from agriculture whilst increasing food production must be embedded in the principle of sustainable use. Government and society should give more prominence to the essential role biodiversity has to the health of the farmed environment and therefore agricultural production.
- Payments through environmental stewardship represent one of the biggest opportunities to ensure a reversal in the fortunes of species and habitats. The Higher Level Stewardship (HLS) scheme presents the greatest opportunity and needs to be effectively resourced (including to increase funding for landscape-scale restoration).
- Government should look at the drivers for a food production increase and establish an evidence base. Government should also outline a clear strategy for tackling food waste.
- Government should seek to implement previously outlined woodland and forestry policies on open habitats and PAWS restoration. The delivery plan for *Biodiversity2020* must include actions to increase levels of woodland management and tackle specific priority woodland wildlife issues – these should not be delayed until the results from the Independent Forestry Panel later in 2012.
- Government should properly define what a degraded ecosystem is including a spatial referencing of where such ecosystems are and when they are 'restored'.

Outcome 2 - Marine habitats, ecosystems and fisheries

2A - By the end of 2016 in excess of 25% of English waters will be contained in a well-managed Marine Protected Area network that helps deliver ecological coherence by conserving representative marine habitats

Link supports the desire for an ecologically coherent, representative and well managed network of Marine Protected Areas (MPAs). The drivers are the international targets that the UK has signed up to including the WSSD and OSPAR target for a representative and ecological coherent network by 2012, respectively, and 2016 milestones for management under the EU Marine Strategy Framework Directive (MSFD). Link strongly suggests that *Biodiversity2020* ambition is strengthened to include all habitats and species, and that greater effort is now put on achieving the international targets as soon as possible after the deadline that is now due to be missed.

Link's suggestions for delivery

- The wording under outcome 2A is ambiguous and should be qualified in the delivery plan; in light of the recent Ministerial announcement⁴ on the Marine Conservation Zone (MCZ) process resulting in a delay to the 2012 target, Link suggests that a revised target i.e. 2013 is explicitly included.
- Any percentage coverage advocated should be applicable throughout UK waters, including offshore waters. As an 'English' document, *Biodiversity2020* should cover both England's offshore and inshore waters. Referring to inshore waters only, the 25% figure is an empty target as 24% of English inshore waters are already designated as MPAs.
- The available literature suggests that a 30% target is more appropriate for marine environmental protection for both inshore and offshore waters.⁵
- The Government should ensure all MPAs are well managed and use all appropriate measures, regulations and enforcement.
- MPAs must be selected to cover the full range of both species and habitats, including mobile species such as basking sharks, cetaceans and seabirds as without them, it will not be an ecologically coherent or representative network.

2B - By 2020 we will be managing and harvesting fish sustainably;

The EU Environment Council Conclusions on the European Biodiversity Strategy includes a sustainable fisheries deadline of 2015. The driving force behind the 2015 deadline is the WSSD target to achieve maximum sustainable yield (i.e. sustainability) of fish stocks, where possible by 2015, and is connected to achieving 'good environmental status' by 2020, as required by the MSFD. The proposed Common Fisheries Policy reforms strengthen this commitment even further by excluding the term 'where possible'. Link strongly suggests that this outcome should have a 2015 deadline, and be in line with our EU commitments.

Link's suggestions for delivery

⁴ Statement from Richard Benyon MP, 15 November

<http://www.defra.gov.uk/news/2011/11/15/wms-marine-conservation-zones/>

⁵ IUCN (2003). Recommendations of the Vth World Parks Congress, in Durban, South Africa (8-17 September 2003). www.uicnmed.org/web2007/CDMURCIA/pdf/durban/recommendations_en.pdf.

- Implementation must take place instead of just a trial on new approaches to fishing quotas. This should include measures to address bycatch as well as minimising discards.
- Additional measures to achieve Good Environmental Status have to be operational by 2016.
- All EU fisheries are operating to ecosystem based multiannual plans (MAPs) by 2015.

2C - By 2022 we will have marine plans in place covering the whole of England's marine area, ensuring the sustainable development of our seas, integrating economic growth, social need and ecosystem management

Link welcomes the articulation of a deadline for marine plan coverage in English waters. However, with no definition of sustainable development provided in *Biodiversity2020*, Link believes that ecosystem-based planning must be at the heart of marine plans. As pressure increases on the seas, with many sea-users competing for space, it is vital that a holistic, ecosystem-based approach to marine planning is implemented, allowing recovery of damaged marine habitats and ecosystems as well as space for wildlife, industry and human activity.

Link's suggestions for delivery

- The sentence, "*There is a need to conserve and where appropriate or feasible restore our marine habitats*" in the rationale to this section is weak and should be clearly articulated in terms of what action will be taken.
- Thorough Sustainability Appraisals must be carried out for marine plans, including Strategic Environmental Assessments.
- Wide, early and effective local, regional and national stakeholder engagement is needed in all marine plans.
- The integration between land use plans and marine plans must be thoroughly understood.
- A clear steer is needed on the carrying capacity of England's seas for emerging uses such as renewable development, alongside the regeneration of marine ecosystems.
- The Government must develop a robust monitoring and review programme to ensure the achievement of sustainable development and an ecosystem-based approach.

Outcome 3 - species

By 2020, we will see an overall improvement in the status of our wildlife and will have prevented further human induced extinctions of known threatened species

Improving populations of species is the most biologically relevant measure of successful conservation in the natural environment. It is therefore vital to place significant focus on the requirements of species to achieve overall ambitions on halting biodiversity. Link remains deeply concerned that the Government is failing to fully acknowledge and commit to the need to put species at the centre of *Biodiversity2020*.

Link's suggestions for delivery

- The delivery plan should define clearly what is meant by an overall improvement in the status of wildlife and describe the ambition in England with respect of

threatened species. Link recommends that this should include securing or improving the status of all s41 species including a clear improvement in the prospects of those species that have declined rapidly (this is in response to Aichi target 12).

- In 2012, Natural England/TBG should identify those species that are most likely to go extinct in England in the next decade and develop a clear programme of action to prevent this.
- Natural England/TBG should identify those s41 species that are unlikely to be conserved adequately through a habitat focused approach and develop a clear programme of action by the end of 2012 to address their requirements.
- Work carried out by the Biodiversity Integration Groups (BIGs) on important landscapes for priority species should be used to inform the action to be taken. A proper assessment should be undertaken of which priority species will be delivered through landscape scale conservation and this should be monitored to note successes and failures.
- The delivery plan should outline how Natural England and other statutory agencies will proactively adapt their approach (programmes, projects, advice, partnerships etc) to habitat conservation to integrate the needs of priority species.
- Government should seek to more efficiently use existing statutory monitoring, such as that on protected sites, to measure progress on priority species. At the very least there must be a coordinated programme for assessing progress against this outcome in the delivery plan.
- Link supports the recommendation for public bodies and authorities to encourage community action in species conservation. Natural England should coordinate a programme of work to enable responsibility for recovery action to be adopted locally, again linking in to national sources of information and advice.
- Natural England/TBG should clarify how species can be added or removed from the s41 list. Particularly those where recovery means they are no longer threatened and those where recent analysis reveals that they now meet the rapid decline criteria.
- Government should commit to supporting adequate EU legislation on invasive species. The legislation already exists to ban from known sale any potential problem species and this should be enacted immediately using the vast evidence base gathered in recent years. The delivery plan for *Biodiversity2020* must include a programme to undertake nationwide action to control and eradicate the most problematic non-native invasive species. Government's approach to preventing more pests and diseases from arriving in England should be linked with approaches to the work on invasive species (e.g. labelling, pot contamination etc).
- The commitment on cetacean by-catch should be strengthened to reflect the UK's commitment to comply with Resolution No. 5 of the 5th Meeting of the Parties of ASCOBANS which states that parties should be aiming towards "the precautionary objective to reduce by-catch to less than 1% of the best available abundance estimate and the general aim to minimise bycatch (i.e. to ultimately reduce to zero)."
- Defra should research alternative methods for reducing cetacean by-catch in addition to the welcome commitment to develop acoustic deterrents.
- Adequate resources should be given to the Border Police Command to reduce illegal import and export of CITES species.
- The Government should develop a clear plan of action under each of its wildlife crime priorities, and provide adequate resources to relevant authorities for their implementation.

- There must be a coordinated programme for assessing progress against this outcome in the delivery plan.

Outcomes 4 – people

By 2020, significantly more people will be engaged in biodiversity issues, aware of its value and taking positive action

Link represents over 8 million people in the UK and collectively has the support of over 170,000 volunteers. To ensure the delivery of outcome 4, it is vital that it is embedded across all Government departments. Government should also encourage businesses and industry, to better recognise their role and step up to deliver for biodiversity.

Link's suggestions for delivery

- This section is aimed at the general public but must be broadened to those in the sector who could actually make a huge difference to biodiversity e.g. farmers/foresters.
- Defra should clarify how it is going to measure the greater involvement of people, and the current baseline. Defra should also set out from the outset what will constitute successful delivery of this outcome. ***How many more people do we need to be taking action to make a significant difference?***
- The delivery plan for *Biodiversity2020* needs to include a realistic assessment of where action is needed, and feasible, by central and local government (including parish councils), statutory bodies, NGOs and community groups.
- Government should acknowledge the enormous contribution which already exists in terms of civil society delivery for wildlife and be realistic about how much more can be achieved by this route.
- Government should take account of recent reports outlining the clear need to retain and invest in expert environmental knowledge, and ensure that roles for biologists and specialists remain within Natural England, other agencies and across both local and national Government.
- The delivery plan must clearly outline how the funding reference in *Biodiversity2020* under 'improving knowledge' will be used to support national societies and schemes which coordinate volunteers and gather vast quantities of the data needed to assess the state of the natural environment.
- Natural England's monitoring strategy should be made publicly available for comment and input.

**Wildlife and Countryside Link
December 2011**

