

Review of the Joint Nature Conservation Committee

A joint response from
Environment Links UK:

Northern Ireland Environment Link
Scottish Environment LINK
Wales Environment Link
Wildlife and Countryside Link

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Environment Links UK

Environment Links UK (ELUK) collectively represents voluntary organisations with more than 8 million members across the UK. It comprises the combined memberships of Wildlife and Countryside Link, Scottish Environment LINK, Wales Environment Link and the Northern Ireland Environment Link. Each is a coalition of environmental voluntary organisations, united by common interest in the conservation and restoration of nature and the promotion of sustainable development across the terrestrial, freshwater and marine environments.

This document represents the ELUK's response to the [joint review](#) of the Joint Nature Conservation Committee being carried out by Defra and the Devolved Administrations.

1. What are the key activities that JNCC currently undertakes for you?

JNCC does not carry out activities directly for Environment Links UK (comprising Northern Ireland Environment Link, Scottish Environment Link, Wales Environment Link and Wildlife and Countryside Link), nor does it carry them out for its member organisations. However, JNCC does provide a wide range of services that benefit Non-Governmental Organisations across the UK in our collective efforts to secure the recovery and protection of the natural environment. Key to these benefits is JNCC's ability to provide high quality scientific expertise and knowledge, impartial evidence-based advice, thought-leadership and a coordinating role with NGOs and other statutory agencies across the UK. We expand on these benefits below.

- ***Offshore marine***

JNCC has a particularly important role in the marine environment and is responsible for scientific and conservation advice to Government for the UK's entire 12 to 200 nautical mile area. This amounts to four times the inshore zone and nearly three times the UK's land mass. JNCC is also critical to coordinating and advising other agencies in the devolved countries, especially regarding offshore waters, which is important given the fact that our seas and mobile species, such as cetaceans and seabirds, do not observe national and regional boundaries and rely upon coordinated international action to maintain population health.

With a UK-remit, JNCC is also able to support the UK Government's greater focus on developing an ecologically coherent network of marine protected areas within OSPAR (Convention for the Protection of the Marine Environment of the North-East Atlantic) biogeographic regions, rather than using administrative regions which makes no ecological sense.

JNCC is increasingly involved in marine work associated with the EU's Marine Strategy Framework Directive (MSFD), and is well placed to do so as implementation is set out according to regional sea basins (e.g. North Sea, Celtic Seas), which lends itself to a UK-based approach.

The UK's marine Special Protection Areas (SPAs) for birds are critically important to conservation in the UK and around Europe. The network remains substantially incomplete, especially in the offshore environment. Through its UK focus, JNCC has a key role in identifying potential marine SPAs based on scientific evidence and reviewing the UK's existing SPA network. JNCC is also uniquely positioned to ensure that the network is complementary, avoids inconsistencies and is fit for purpose. JNCC's contribution should result in the UK delivering an appropriate ecologically coherent network of protected areas at

land and sea, and ultimately meet its legal obligations. It is difficult to see how such essential work could be completed without an organisation such as JNCC.

A few gaps also remain in the UK's marine Special Area of Conservation (SAC) network, most notably Harbour porpoise SACs. JNCC is essential to the identification of these sites. Once designated, the management and monitoring of marine Natura 2000 sites in the offshore environment will be a key challenge that JNCC is well placed to address. Using established international criteria to identify and designate Marine Protected Areas (MPAs) is a vital first step. However, the monitoring and management is a fundamental feature of future protection and is considered essential for the future health of MPAs and compliance with international treaty and law.

JNCC also has a valuable role in coordinating the Marine Protected Area (MPA) technical group, which ensures consistency in designation and management across the UK and addresses the thorny issue of ecological coherence within the network of MPAs. Devolved countries, particularly Northern Ireland, rely heavily on JNCC for conservation advice, methods of monitoring and condition assessment for MPAs and for wider monitoring of marine habitats and species. JNCC has fulfilled an essential role in providing most of the data supporting the recent proposed extensions to a number of marine SPAs in Northern Ireland waters.

- ***UK Overseas Territories (UKOTs)***

JNCC plays a key and unique role in coordinating and progressing the Government's UK Overseas Territories (UKOT) Biodiversity Strategy and the official-level working group. JNCC has established strong working relationships with key officials in many of the Overseas Territory Governments' Environment Departments. This role is particularly important given the lack of full time UKOT staff in any other UK Government department and the extent of influence that has been achieved.

In addition, there is an increasing need for JNCC's scientific expertise and ability to collect high quality data in light of increasing threats from the development of hydrocarbon extraction and renewables in the South Atlantic, and the growing need for impact assessments for potential Marine Protected Areas in the region.

- ***International treaties and IUCN***

The UK is widely regarded as having a leading role with a number of international treaties, due to JNCC's long-term commitment, leadership and high degree of technical excellence. Treaties include the Convention on Migratory Species and Ramsar. It is vital both to the UK's influence overseas and to the future value of these treaties that JNCC continues to maintain its active participation in such matters. JNCC also plays an important role in liaising with the International Union for Conservation of Nature (IUCN), which plays a key function in generating and shaping much of the content of international conventions.

- ***UK species monitoring***

JNCC plays a central role in coordinating the monitoring and recording of a wide range of species within the UK. JNCC not only provides core funds for many of the existing schemes, but also provides thought leadership to help develop the schemes.

Such species monitoring programmes include: the Breeding Bird Survey (JNCC, British Trust for Ornithology (BTO), RSPB); the Wetland Bird Survey (JNCC, BTO, Wildfowl and Wetlands Trust (WWT)), the Joint Cetacean Protocol (JNCC, Natural Resources Wales (NRW), Sea Mammal Research Unit, Department of the Environment, Heritage & Local Government, The Crown Estate, University College Cork, Irish Whale and Dolphin Group, Sea Watch Foundation); and the Seabird Monitoring Programme (JNCC and a large number

of Government agencies, research institutes and NGOs across the UK); the National Bat Monitoring Programme (Bat Conservation Trust, JNCC, Defra, Natural England (NE), NRW, Northern Ireland Environment Agency (NIEA), Scottish Natural Heritage (SNH)); the National Plant Monitoring Scheme (JNCC, Plantlife, Botanical Society of Britain and Ireland, Centre for Ecology and Hydrology (CEH)); and the UK Butterfly Monitoring Scheme (JNCC, Butterfly Conservation, CEH, BTO, NRW, NE, NI Environment Agency, Forestry Commission, SNH).

JNCC also works on recording schemes for a range of invertebrates and also provides valuable quality assurance of species status assessments, acting as a neutral arbiter where status assessments are disputed. JNCC, working in partnership NGOs, ensures that the UK remains at the global forefront in its ability to monitor the status of its wildlife.

- ***UK reporting***

JNCC's key role in supporting and actively contributing to - both financially and intellectually - a range of high quality, taxa specific monitoring programmes, means that it is uniquely able to provide valuable data on a range of UK animal and plant species. This also ensures that the UK meets its reporting obligations in a coherent and cost effective way. For example, JNCC reports on the Convention on Biological Diversity, with associated reporting and monitoring being carried out to ensure UK compliance at a domestic level. JNCC also performs an important role in approving the Guidelines for Selection of Biological SSSIs, which are currently under review. This is important to ensure future designations are fit for purpose.

JNCC also monitors the targets included in the Global Strategy for Plant Conservation and the Habitats and Birds Directives. In particular, reporting under JNCC-led Article 12 of the Birds Directive and Article 17 of the Habitats Directive provides crucial evidence of whether conservation effort is being deployed successfully.

- ***CITES Scientific Authority***

JNCC hosts the UK's CITES Scientific Authority for Fauna at its Peterborough office. NGOs' relationship with relevant JNCC staff is an essential component of CITES-related work. JNCC provides an initial point of contact with respect to wildlife trade issues that are specific to the UK, and those that are subsequently taken to EU forums in the process of negotiating collective EU positions on CITES-related issues.

JNCC staff also represent the UK on the Scientific Review Group, which meets quarterly to review EU policy on the granting of import permits for animal products from species listed on the annexes of the EU's Wildlife Trade Regulations. JNCC provides a mechanism by which NGOs can input into these deliberations.

JNCC staff produce impact statements for court cases involving the prosecution of CITES offences, which is crucial to achieving effective prosecution and conviction, and allowing the judiciary to set sufficient penalties. This is vital given the common misperception of prosecutors and judiciary that wildlife crimes are victimless crimes.

- ***Identifying National Priorities***

JNCC plays an important, objective role in coordinating and chairing the Wildlife Crime Conservation Advisory Group (WCCAG), which is an informal advisory body to the national strategic Wildlife Crime Tasking and Coordinating Group (UK TCG), which establishes wildlife crime priorities for targeted enforcement action in the UK.

2. What does JNCC do well and what could be improved?

Does well

Overall, JNCC delivers most of its services very well, in spite of the financial constraints and extent of under-funding that it operates under. Key valuable functions and outcomes are as follows:

- Providing highest quality knowledge, expertise and scientific evidence to underpin effective Government policymaking and provide benefits to the economy and to society
- Ensuring that the UK is well represented in Europe, particularly in delivering and reporting on its obligations under the EU Nature Directives
- Coordinating the UK's obligations under various Multilateral Environmental Agreements (MEAs) allows JNCC to identify synergies and opportunities for cost effective delivery. Expertise within JNCC plays a very important role in driving up delivery standards to a number of MEAs and Directives
- Providing impartial evidence-based advice, recognising and supporting the importance of consistent, long-term monitoring of the natural environment to ensure safeguarding of the natural capital and ecosystem services upon which the long-term sustainability of the UK economy depends
- Coordinating and, in many cases, funding highly cost-effective long-term partnerships with NGOs and other stakeholders, enabling effective use of NGO expertise and citizen science networks, thus providing excellent value for money but also ensuring high quality monitoring and surveillance across a broad range of taxa. Many of these partnerships have endured for many years, providing highly valuable information
- Providing a coordinating and convening role to nature conservation across the UK, underpinned by a consistent and rigorous scientific approach. This coordinating role will become increasingly important as budget restrictions and departmental reorganisation in the devolved countries impact on the capacity of administrations to deliver the full range of their statutory obligations, including for EU Directives
- Providing advice for marine nature conservation and the management of the information that underpins this advisory role. Biological marine data collection and analysis is particularly important in supporting site identification, management, and reporting which is key to meeting a range of obligations and commitments the UK Government's plans to complete identification of the marine SPA network, and effective implementation of the Marine Strategy Framework Directive
- Contributing to the Ramsar Scientific and Technical Review Panel (STRP) and the African-Eurasian Migratory Waterbird Agreement (AEWA) Technical Committee, thereby playing an important role in implementing these international conventions and agreements and establishing an excellent reputation for the UK.

Could improve

JNCC carries out a great deal of valuable work. Below we make suggestions on how JNCC could provide even more value.

- JNCC needs to improve its communications and stakeholder engagement to raise awareness of what it does. Clear information is required by the governments of the UK and its constituent countries on the full extent of the services that it provides. JNCC also needs to communicate effectively with wider audiences, including industry; the public and environmental NGOs beyond those with whom it has developed long term partnerships. Effective communications and stakeholder engagement largely requires a

culture shift within JNCC, rather than significant additional funds and, if delivered effectively, would help people to understand the work of JNCC, its strategic direction and its value to NGOs, industry and wider society

- JNCC should continue to carry out its functions on behalf of the UK Government but also seek to provide support with country-specific functions that will allow for better coordination of data collection, monitoring and frameworks for nature conservation
- JNCC is also well placed to play a stronger and more formal role on the reporting and auditing of biodiversity indicators, with annual reporting to the Government and the Natural Capital Committee
- Notwithstanding our points on monitoring above, much greater investment is needed in delivering basic information on distribution, numbers and threats of a wider range of priority taxa in the UK, such as amphibians and reptiles, and monitoring of Article 17 of the Habitats Directive. Paring down JNCC's involvement in this area has led to duplication of effort, reduced coherence and confusion of issues that require a UK focus, such as SSSI condition assessments, species licensing and species monitoring. New investment should not be at the expense of current research and monitoring initiatives
- JNCC should support species Red Listing at country level, given its increasingly relevant and useful role in recent years due to the devolved delivery of many biodiversity processes, and certainly the setting of conservation priorities. Red Listing would assist in interpreting criteria and datasets in order to provide a degree of consistency across the UK
- Currently, the UK is falling short on its obligations under the AEWA and the Birds Directive, to set management standards and monitor the hunting of harvestable waterbirds. JNCC could help ensure compliance with the UK's international obligations by coordinating and overseeing the monitoring of waterbird hunting in the UK.

A final point, and not a criticism of JNCC, is that JNCC's effectiveness in delivering its functions can be impaired through a lack of sufficient funding and political support. We therefore strongly recommend that a focus is placed on effectively funding and prioritising JNCC, rather than seeking alternative structures for delivery.

We also recommend that the review explores how efficiently the government is using JNCC's advice to maintain compliance with domestic and international commitments and, most importantly, deliver the aspirations of a large proportion of the UK's population in protecting and restoring the UK's rich wildlife heritage, on land and at sea.

3. To what extent does JNCC provide value for money in what it does for you?

JNCC provides excellent value for investment of taxpayer's money. We would score JNCC "very high" with regards to the categories provided in the online survey. JNCC's UK coordination role brings significant added value to other investment in nature conservation, particularly through the statutory agencies across the devolved countries and by being in a position to collate country and UK data to help underpin nature conservation prioritisation and monitoring. The UK-wide role ensures a high degree of consistency in providing reliable, high quality outputs and avoids duplication and additional costs across the devolved countries.

In an increasingly devolved context driving ever greater subsidiarity in environmental policies, the role of JNCC as an evidence led advisory body, monitoring and reporting coordinator and 'honest broker' where differences of opinion exist between statutory bodies is more important now than ever. JNCC also ensures cost effectiveness and collation of high quality and robust data by empowering NGOs to work in partnership with other statutory agencies, academic institutions and NGOs to harness citizen science. JNCC also fulfils an

important role as an independent body and we would recommend that its position outside central Government be maintained.

It is also important that the Government considers the socio-economic benefits of conserving nature and the natural capital that nature provides. This was explored in the Natural Capital Committee's State of Nature Report. One of JNCC's most important areas of work is in providing the data to underpin the designation of the network of offshore Marine Protected Areas and ongoing monitoring programmes. A network of MPAs not only provides biodiversity benefits, but is also calculated to provide significant economic benefits.

4. Looking to the future, should JNCC refocus its resources on new areas of work or are there any areas it should be focusing fewer resources on?

We would like to see JNCC being afforded sufficient funds and political support to enable it to deliver its functions effectively. The current mix of activities is generally appropriate and we would offer just the following points on functions that would benefit from greater focus:

- JNCC is well-positioned to make significant contributions to decisions underpinning development and delivery of the 25 year plans on both the Environment and Food and Farming, and is well placed to lead and coordinate the UK's actions to deliver the Natural Capital Committee's recommendations and contribute strategically to the Government's plans for natural capital accounting, particularly with regard to establishing effective metrics
- More detailed work on ecosystem services, covering recognition, valuing services consistently, and methodologies for incorporating into land use planning and wider decision-making in the devolved administrations
- Horizon scanning for future threats and challenges for nature conservation which may impact on the UK economy and its ability to deliver commitments both domestically, and at the EU and international levels. Such issues may include climate change, invasive non-native species and plant and animal diseases.

5. Are there other organisations that could deliver JNCC's existing activities or parts of these? Please specify the organisations and activities.

The cost of devolving JNCC activities to country agencies would be significantly higher than if they were carried out by JNCC, with serious duplication of effort and a lack of consistency and highest quality data collection and analysis. JNCC is the only organisation to advise the UK Government and the devolved administrations while implementing the UK reporting responsibilities. It also provides data and evidence that is applicable and useful at both the country and UK level.

JNCC provides impartial, non-political, evidence based expertise. Not fulfilling its current unique role would lead to serious issues with regard to compliance with EU Directives and international agreements. As long as the UK remains intact and is the signatory to such agreements it is vital that the services that JNCC provides are delivered by a UK-wide body.

Rather than introducing significant structural changes, we recommend that efforts now be focussed on adequately resourcing JNCC to enable it to effectively implement and deliver its functions. Actions must be prioritised and increased emphasis placed on supporting the necessary numbers of staff, maintaining and developing the high levels of knowledge and expertise for which JNCC is renowned.

Environment Link UK members supporting this response:

This response is supported by the following 26 members of **Wildlife and Countryside Link**:

- Amphibian and Reptile Conservation
- A Rocha UK
- Badger Trust
- Bat Conservation Trust
- British Ecological Society
- Born Free Foundation
- Buglife - The Invertebrate Conservation Trust
- Bumblebee Conservation Trust
- Butterfly Conservation
- Environmental Investigation Agency
- Freshwater Habitats Trust
- Friends of the Earth England
- Humane Society International UK
- International Fund for Animal Welfare UK
- Marine Conservation Society
- National Trust
- Plantlife
- Royal Society for the Prevention of Cruelty to Animals
- Royal Society for the Protection of Birds
- Salmon and Trout Conservation UK
- The Rivers Trust
- The Wildlife Trusts
- Whale and Dolphin Conservation
- Woodland Trust
- Wildfowl and Wetlands Trust
- WWF-UK

This response is supported by the following seven members of **Wales Environment Link**:

- Bat Conservation Trust
- British Mountaineering Council Cymru
- Butterfly Conservation Wales
- Buglife – The Invertebrate Conservation Trust
- Plantlife Cymru
- Royal Society for the Protection of Birds Cymru
- The Vincent Wildlife Trust

This response is supported by the following 16 members of **Scottish Environment LINK**:

- Amphibian and Reptile Conservation
- Association for the Protect of Rural Scotland
- Bat Conservation Trust
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation Scotland
- Froglife
- Hebridean Whale and Dolphin Trust
- Marine Conservation Society Scotland

- North East Mountain Trust
- Plantlife Scotland
- Scottish Badgers
- Scottish Campaign for National Parks
- Scottish Wild Land Group
- Royal Society for the Protection of Birds Scotland
- Whale and Dolphin Conservation
- Woodland Trust

This response is also supported by the following 67 members of **Northern Ireland Environment Link:**

- Action Renewables
- Alliance Youth Works
- ARENA Network
- Belfast Civic Trust
- Belfast Healthy Cities
- Belfast Hills Partnership
- Broughshane Improvement Committee
- Bryson Charitable Group
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation
- Campaign for the Protection of the Countryside
- Carntogher Community Association
- Causeway Coast and Glens Heritage Trust
- Cavehill Conservation Campaign
- Chartered Institute for Archaeologists
- Colin Glen Trust
- Community Places
- Copeland Bird Observatory
- Council for British Archaeology
- County Armagh Wildlife Society
- Creggan Country Park
- EcoSeeds
- Federation of City Farms and Community Gardens
- Field Studies Council
- Glens Red Squirrel Group
- Grass Roots Conservation Group
- Green Action Belfast
- Greencastle Area Residents Group
- Holywell Trust
- Institute of Public Health
- Irish Hare Initiative
- Keep Northern Ireland Beautiful
- Lagan Valley Regional Park
- Landscape Institute Northern Ireland
- Lecale Conservation
- Lough Erne Heritage
- Lough Neagh Partnership
- Mountaineering Ireland
- Mourne Heritage Trust
- National Trust
- Natural Copeland
- North Belfast Partnership
- Northern Ireland Badger Group
- Northern Ireland Forest School Association
- Outdoor Recreation Northern Ireland
- Royal Society for the Protection of Birds
- Rural Community Network
- Rural Development Council
- Speedwell Trust
- Sperrins Gateway Landscape Partnership
- Strangford Lough and Lecale Partnership
- Supporting Communities NI
- Sustainable Northern Ireland
- Sustrans
- Talnotry Avian Care Trust
- The Conservation Volunteers
- The Organic Centre
- True Harvest Seeds
- Ulster Angling Federation
- Ulster Archaeological Society
- Ulster Architectural Heritage Society
- Ulster Federation of Rambling Clubs
- Ulster Wildlife
- Waste and Resources Action Programme
- Wildfowl and Wetlands Trust
- Woodland Trust
- WWF