

Ant Maddock
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11th January 2008

Dear Ant,

Re: BRIG paper on UK BAP success criteria and targets

Thank you for giving Wildlife and Countryside Link (Link) the opportunity to comment on the BRIG UK BAP success criteria and targets paper.

The enclosed response outlines the elements of the BRIG paper that we would support and those that remain significant areas of concern. Link does not feel that the approach as outlined will help the delivery of the UK BAP as thinking appears confused between targets and success criteria. We therefore recommend five urgent actions for the Partnership, which, if achieved, we believe will make a significant contribution to the delivery of the UK BAP.

We hope our comments and recommendations are useful in helping you formulate a plan to take this vital process forward.

Yours sincerely



Dr Nigel Bourn
Chair, Biodiversity Working Group

cc Malcolm Vincent



UK BAP SUCCESS CRITERIA AND TARGETS

Comments from Wildlife and Countryside Link (Link) on BRIG paper by Ant Maddock

Introduction

Wildlife and Countryside Link (Link) welcome the opportunity to comment on the BRIG UK BAP success criteria and targets paper. This response is supported by the following organisations:

- Bat Conservation Trust
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation
- Herpetological Conservation Trust
- The Mammal Society
- Plantlife International
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- Woodland Trust

There are elements of the paper that we would support but there remain significant areas of concern. We do not feel that the approach as outlined will help the delivery of the UK BAP as thinking appears confused between targets and success criteria. We would like to take this opportunity to recommend five priority actions for the Partnership, which, if achieved, will make a significant contribution to the delivery of the UK BAP.

Our key recommendations are as follows:

- 1. Species Action Plans should be written where there are a series of different issues that need to be addressed and the cause of the decline is known.**
- 2. Action plans for all new priority habitats should be developed as a matter of urgency, particularly as many new priority species have been signposted to habitat action.**
- 3. All species that were listed due to severe decline (criteria 3) should be given SMART specific country targets.**
- 4. Interim targets should be set for species where the action is for research and/or monitoring only, with a commitment and mechanism to develop SMART 'end' targets in due course.**
- 5. All habitats should be given SMART specific country targets.**

In the section below we set out further comments in support of our recommendations to address specific areas of concern.

Action Plans

A principle concern is that the paper does not provide any clarity over which species require action plans and therefore targets. There is an assumption that those species where the signposting exercise identifies species or site-specific action should have an action plan prepared. We are not convinced that the signposting exercise can be used uncritically in this way and would urge that the species expert groups be more explicitly involved in this decision, particularly if there is to be a limit on the number of action plans prepared.

Species Action Plans should be written where there are a series of different issues that need to be addressed and the cause of the decline is known (Recommendation 1).

There is no mention of which habitats will have action plans. All existing priority habitats had targets updated in 2005/6. This paper makes no comment on the new priority habitats and whether they will have action plans developed.

Action plans for all new priority habitats should be developed as a matter of urgency, particularly as many new priority species have been signposted to habitat action (Recommendation 2).

Target setting

We agree wholeheartedly with the purpose and value of specific, aspirational targets and are pleased that this is accepted in the paper. We recognise that this would represent a substantial amount of work, but feel the rewards in terms of helping to halt biodiversity loss would be substantial.

All species that were listed due to severe decline (criteria 3) should be given SMART specific country targets (Recommendation 3).

Interim targets should be set for species where the action is for research and/or monitoring only, with a commitment and mechanism to develop SMART 'end' targets in due course (Recommendation 4).

All habitats should be given SMART specific country targets (Recommendation 5).

Success criteria

In our view the purpose and value of setting success criteria remains unclear. The paper assumes that setting success criteria will be quicker and simpler than setting proper targets. We do not believe that this is necessarily the case and thinking around this issue is rather muddled.

Many of the success criteria examples given in the paper could equally be considered targets. For example, '20 additional hectares of traditional orchards' is what would currently be considered a HAP target and many of our existing priority habitats already have such numerical targets.

A target setting mechanism should be developed, which is appropriate to the action required and our desired outcomes, whether this be increased or more sustainable populations or extent.

Criteria for 'de-listing'

The point at which a species or habitat can be removed from the priority list is more problematic. There are some species and habitats that cannot realistically be expected to come off the list. For example, species that are internationally threatened are unlikely to be removed from the list through action that is undertaken in the UK.

Similarly habitats that are continually lost and eroded by development, or for which there is no comprehensive inventory of extent, and which are home to many of our priority species, are unlikely to come off the list, unless and until absolute protection from loss and reversal of the downward trend of extent is achieved.

The paper also refers to stability or viability as a reason for de-listing; however for those species or habitats that have suffered significant declines stability does not represent success.

It is difficult to envisage a time when habitats such as native woodland, coastal saltmarsh or lowland heathland would be removed from the priority list. Over time, the targets for these habitats may change to reflect a move from the re-creation of the habitat to maintenance of its extent; however they will continue to be semi-natural habitats of national or international importance for the biodiversity that they support.

Thus in our view, and as stated above, the concept of success criteria is unclear and confused for habitats.

**Wildlife and Countryside Link
January 2008**