

Wildlife and
Countryside



Response to Taking it on – developing UK sustainable development strategy together

Wildlife and Countryside Link

July 2004



environmental investigation agency



THE HERPETOLOGICAL
CONSERVATION TRUST



NATIONAL FEDERATION
OF BADGER GROUPS



Wildlife and Countryside Link brings together 33 voluntary organisations concerned with conservation and protection of wildlife and the countryside. Our members believe that the UK's sustainable development strategy is central to preserving the UK's environment, and thus our biodiversity, countryside and cultural heritage. We therefore welcome the government's plan to put in place a new UK strategic framework for sustainable development through to 2020, to provide both a consistent approach and focus across the UK, and renewed action to deliver sustainable development goals. We also welcome the opportunity to comment on this broad-ranging issue.

WCL's Key Concerns:

- Definition of sustainable development
- An integrated approach and trade offs
- Climate change
- Sustainable consumption, production and use of natural resources
- Environment and social justice – absence of biodiversity and cultural heritage
- Getting structures right and integration with other policy areas
- Getting the message across
- Use of indicators

Definition of sustainable development

We believe a robust definition of sustainable development is core to the successful implementation of the government's sustainable development strategy in the UK.

We support the use of the Bruntland Report¹ definition for sustainable development 'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs', as used in DEFRA's Rural Strategy 2004. However, we also recognise the value of promoting improvements to quality of life and biodiversity as contained in the Forum for the Future² definition 'Sustainable development is a dynamic process which enables all people to realise their potential and improve their quality of life in ways which simultaneously protect and enhance the Earth's life support systems', and also within the Caring for the Earth³ definition 'Sustainable development means improving the quality of human life while living within the carrying capacity of the earth.'

We view biodiversity and cultural heritage as key measures of quality of life, the state of the Earth's life support system and the carrying capacity of the earth.

An integrated approach and trade offs

We feel that the current essentially three pronged – environment, social, economic - approach to the objectives of sustainable development, does not translate effectively to an integrated strategy. The objectives as defined by the government could indeed be mutually exclusive, leading to unnecessary tensions between the different sectors responsible for their delivery and abuse by parties which use them to justify unsustainable activities. In particular we believe that the objective of 'maintenance of high and stable levels of economic growth and employment' should only be promoted within the bounds of the other objectives.

Rather than segregating the objectives of sustainable development, we believe that instead it is necessary to promote the *harmonisation* of economic and social needs with environmental needs, to optimise development where it is appropriate. Any definition of sustainable development and its objectives should therefore emphasise a fully integrated approach and only promote economic growth that is compatible with environmental protection (including biodiversity and cultural heritage) and takes place within the carrying capacity of the planet.

Trade-offs should be used to communicate the potential for a more integrated and harmonious sustainable alternative and better communicate the choices involved in development and economic growth. This direction is necessary to ensure that key issues such as ‘polluter pays’ and ‘the precautionary principle’ are included in legislation and statements of policy. We would like to see the government provide examples of Sustainable Development in action – in order to provide clearer guidance for implementation.

We would also like to see consideration within the strategy of the global effect of our activities and the requirement that we do not effectively ‘export’ unsustainable practices overseas. The strategy must focus action both on conserving natural resources within the UK but also on curbing demand for, and ensuring sustainable use of, natural resources from overseas. For example hard woods, peat and sphagnum mosses are sectors where tightened UK legislation has simply resulted in a transfer of excessive UK demand to imports, transferring the damage from the UK to habitats overseas⁴.

We are also very concerned about the focus on economic *growth* – expressed in the form of GDP or GNP as the key indicators. We believe that environmental factors – including biodiversity and cultural heritage - are core to both individual and national ‘wealth’. As with the need for an integrated approach to sustainable development we would like to suggest a change in focus to an integrated approach to economic or quality of life *progress*, and suggest the adoption of a Social, Environmental and Economic Welfare Index to measure this. Examples of this include the Green Growth indicator from China and social aggregate indicators used in South America which could be combined with WWF’s Ecological Footprint tools and quality of life tests.

Climate change

While we welcome the prioritisation of climate change in the strategy, we are frustrated that there is not sufficient emphasis on the need to reduce greenhouse gas emissions throughout the economy, through increased efficiency and reduced use of high emission services and activities (e.g. car and airline travel etc). We feel strongly that reducing the impacts of our activities must be a priority alongside the consideration of how we adapt and remain competitive in a ‘climate friendly’ way. We would also like to see a framework put in place for more discussion on the relative benefits, and environmental costs, of different renewable energy sources as well as the relative subsidies applied, for example for wind farms versus solar power and wood fuel.

We believe that one of the main barriers to progress is insufficient adaptation strategies developed at a central, regional and local government level to facing up to the impacts of climate change. We believe that greater priority should be given to the

government's departmental audits to identify risks and a new framework to outline guiding principles for adaptation strategies, which need to be applied at a regional level, and become a key part of the process of land use planning, resource planning and development control.

There also appears to be no real recognition of the need for the UK to use its political influence – most significantly with the US, but also within the EU through more challenging National Allocation Plans for the upcoming Emissions Trading Scheme - to ensure progress on reducing greenhouse gases globally. We are also frustrated that there is no recognition that the UK's 8.7% reduction in carbon dioxide emissions from 1990 to 2002 (and the reported increase in emissions in 2003) puts it significantly behind track in meeting its national goal of reducing emissions by 20% by 2010.

Sustainable consumption, production and use of natural resources

We welcome the proposal that our natural resources be one of the four key priority areas for the new sustainable development strategy. However, we are concerned that the discussion appears to focus only on our *use* of natural resources, and the limits they present to economic growth, rather than the need to *protect* and *value* the full range of our natural resources (including biodiversity and the countryside) in their own right. We believe that natural resources should also not be viewed outside of their cultural context, and would stress the need to preserve our cultural heritage alongside natural resources.

We believe that it is the responsibility of government to determine areas of key concern regarding excessive consumption or detrimental use of all our natural and cultural resources, and then to ensure that these are addressed through policy and regulation, as is consistent with the Polluter Pays Principle.

Food and consumption waste also needs to be addressed – current legislation supports a wasteful approach to fisheries management, with huge quantities of fish being discarded once caught, while government support for the proposed European Chemicals Regulation (REACH) and ratification of the Stockholm Convention would help address issues of exposure for humans, wildlife and the environment to hazardous chemicals. Meanwhile we also recommend that the government implement a rating system for products and services to reflect their environmental impact on a wider scale, similar to that adopted in Scandinavia and currently used for some electrical appliances such as fridges and washing machines.

Accompanying these moves, full life-cycle analysis needs to be conducted to ensure that solutions in one area do not create problems in others – such as the recycling of certain products using quantities of energy that negate the environmental benefit, rather than reduction being the main focus for action.

Environment and social justice – absence of biodiversity and cultural heritage

We welcome the emphasis on Environment and Social Justice as one of the four priority areas of sustainable development. We believe that a key goal and part of the process of sustainable development should be to ensure that everyone benefits and no one loses.

However, we are concerned that the inherent links between people, biodiversity and healthy ecosystems and their cultural heritage has not been made. The state of our biodiversity and historic environment are key measures of the quality of the environment, and should be directly deliverable attributes of sustainable development. A healthy biodiverse ecosystem is our life support system, and provides both direct and indirect economic, social, aesthetic, cultural and spiritual benefits. Cultural heritage is similarly fundamental to people's social roots, interactions and sense of belonging. We thus believe that it is imperative that any discussion of 'Environment and social justice' has at its core, objectives to conserve biodiversity and properly functioning ecosystems, coupled with respect for people's cultural heritage, both in the environment and through education, understanding and knowledge.

The need to prioritise biodiversity protection as a critical component of sustainable development was recognised by the World Summit on Sustainable Development in 2002 'Biodiversity ... plays a crucial role in overall sustainable development'⁵. Furthermore in June 2004 the EU Environment Council urged Member States 'to promote the integration of biodiversity considerations in their National Sustainable Development Strategies, national development plans, national budgets, and Poverty Reduction Strategy Papers (PRSPs)'⁶.

Getting structures right and integration with other policy areas

The implementation of an integrated sustainable development strategy is hampered by the absence of well-defined structures and processes for achieving coherence in the machinery of Government.

At the central government level, the apparent imbalance of power between DEFRA and the DTI, and the lack of constructive dialogue between the two departments, does not imply an integrated, sustainable approach to development and continues to maintain the belief that economic growth outweighs environmental issues as a government priority. The lack of effective engagement between the DCMS, DEFRA, the DTI and the ODPM on key responsibilities for cultural heritage, reinforces this disjointedness. Meanwhile key policy roles are played by completely separate units within the Office of the Prime Minister and the Cabinet.

The lack of cross departmental commitment and integration was evident during the stages of the proposed Planning and Compulsory Purchase Act where planning decisions were only required to have 'a view to contributing to the achievement of sustainable development' rather than the objective of achieving sustainable development. Furthermore although the remit of DEFRA and its agencies has been altered to implement sustainable development, and all conservation legislation (e.g. the Water Act 2004) has had to address sustainable development, legislation promoted by the DTI (eg the Energy Bill) has not.

And although DEFRA is the lead department for sustainable development, with the Sustainability Commission reporting to it, neither of these bodies has the cultural heritage as a core part of its sustainability remit even though it is part of the existing framework for sustainable development, reinforced by the Government's statement 'The Historic Environment – a Force for Our Future.'

This general disjointedness of provision for sustainability in part reflects the current lack of integration between, and imbalance in the relative importance being attached to, the different pillars of sustainable development as defined in the government's sustainable development strategy. A robust and fully integrated definition of sustainable development, with the importance of the natural and historic environment fully recognised, will assist with the integration of policy across Government and require appropriate structures and resources to see its delivery. This will ensure that environmental issues remain 'mainstream' and help make explicit the links across departments, e.g. with targeting funding support, linking with planning policy, linking environment to the education and health agendas. Such linkage should see greater synergy with different policy mechanisms and encourage 'joined up thinking', leading to wider social inclusion and stakeholder engagement with policy implementation.

However, more integration is also needed in the actual infrastructure of government departments. At the central government level we suggest that an interdepartmental network or independent panel is needed to conduct a sustainability proofing or audit, thus ensuring that the principles and practices of sustainable development are applied across departments. Alternatively the sustainable development unit could be placed closer to the centre of Government, potentially in the Office of the Prime Minister or the Cabinet, thus giving it the power to balance the needs of the various departments involved and make decisions on the basis of sustainable development principles.

Within DEFRA, we welcome the principles behind the government's review of Modernising Rural Delivery in order to strengthen and renew both policy and delivery. The role of the new integrated agency should be developed through a clear understanding of a Governmental imperative to achieve environmental quality as a measure of sustainable development. Its duties should be defined by looking holistically at the 'environmental' pillars of sustainable development and determining how these can all be delivered with reference to the roles and duties of other agencies in this field. We believe it is essential that the new integrated agency has the duty not only to "promote and enhance" biodiversity, landscape and our seas, but also a specific duty to "protect and conserve" them. The agency must also have a central place in new improved regional and local arrangements for the environment and spatial planning, and be able to inform policy development within the new regional structures when necessary.

Getting the message across

We believe that a major barrier to progress is inertia and a lack of understanding by the public and consumer. To accompany the required planning and strategic changes to be enforced by the government, we believe that a cultural change is required and that it is part of the role of government to help inform the public about how to improve their quality of life, not just their income.

We support the recent hard-hitting TV community service and 'Turn the world' radio adverts with energy efficiency, waste reduction and recycling messages. We believe these should be maintained and supported. Accompanying this we would like to see more emphasis on education for Sustainable Development in the national curriculum and life long learning, and also a program of engagement with both individual and corporate consumers to encourage them to make more sustainable choices. The latter would require testing methods to bring consumers face-to-face with the consequences

of consumption, in a way which leads to new choices being made. Ecological Footprinting tools, such as that used by the WWF, and ecological budgeting, which tracks the real movement of resources around the economy, would help achieve these goals on both a micro and macro level.

Use of indicators

One of the main strengths of the existing strategy is the breadth of indicators contained in Quality of Life Counts. We feel it is important that this review does not involve the loss of indicators simply on the basis that they are difficult to measure. One of the main weaknesses of the current system is that this wider set of indicators is often forgotten about. Many of these 150 indicators are very valuable and provide a useful guide to action whilst it is our view that there is far too much focus on the headline set.

We think it is important to have core EU and international commitments in the UK strategic framework and included in country and regional strategies, such as the Gothenburg declaration on halting loss of biodiversity by 2010. These core commitments should be accompanied by indicators which, as far as possible, enable consistent reporting from the ground right up to EU and international level. More needs to be done to develop standard, local to global indicators. The current lack of read-across is a handicap.

We believe that in addition to purely being used to measure progress (or underperformance), more emphasis should be placed on using indicators to set quantifiable and measurable targets for sustainable development. In addition, central to their credibility, is the use of the indicators as policy drivers, although caution is required to ensure that this is conducted on a comprehensive basis with overall sustainable development being achieved, rather than a narrowly defined benchmark as defined by one or two specific indicators, that may distort policy to the detriment of factors that are not targeted.

We suggest that the government also consider developing more indicators to which people can relate, and perhaps get more involved in monitoring, for example to enable individuals to be able to measure their own sustainability or ecological footprint. This could be used to promote interest and education on the issue of sustainable development. There is also a need to broaden the remit of indicators, firstly to encompass issues currently off the agenda such as the state of the cultural heritage.

This statement is supported by the following members of the Wildlife and Countryside Link:

The Bat Conservation Trust
British Mountaineering Council
Buglife – The Invertebrate Conservation Trust
Butterfly Conservation
Council for British Archaeology
Council for National Parks
Environmental Investigation Agency
Friends of the Earth

Greenpeace
The Herpetological Conservation Trust
Marine Connection
Marine Conservation Society
National Federation of Badger Groups
Open Spaces Society
Plantlife International
Ramblers' Association
Royal Society for the Protection of Birds
Shark Trust
Whale and Dolphin Conservation Society
Wildfowl & Wetlands Trust
The Wildlife Trusts
Woodland Trust
Youth Hostel Association (England and Wales)
Zoological Society of London

¹ Bruntland Report (1987). World Commission on Environment and Development - Our Common Future.

² Forum for the Future (2004). Homepage - www.forumforthefuture.org.uk.

³ Caring for the Earth (1991). World Conservation Union, United Nations Environment Programme and World Wide Fund for Nature.

⁴ The UK's sustainable development strategy should support action towards Targets 11-13 of the CBD Global Strategy for Plant Conservation, as detailed in Plant Diversity Challenge: The UK's response to the Global Strategy for Plant Conservation.

⁵ Report of the World Summit on Sustainable Development (2002). Johannesburg Summit 2002. Paragraph 44.

⁶ Environment Council Meeting (2004). Council of the European Union. Page 21.