



# COP15 one year on - where we are now

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December 2023

Wildlife and  
Countryside



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## Introduction - what happened at COP15?

In December 2022, after a delay of over two years, the Convention on Biological Diversity (CBD) COP15 finally took place in Montreal, Canada. Despite a rocky road leading up to the talks, world leaders agreed to the text of the [Kunming-Montreal Global Biodiversity Framework](#) (KMGBF), a landmark agreement which signalled a collective intent to create a nature-positive future.

The guiding star of the new framework is a mission to halt *and reverse* the loss of biodiversity by 2030. Alongside this sits four global goals for 2050, and 23 action-oriented targets to be achieved by 2030. The new mission and targets go way beyond the ambition of the previous Aichi targets agreed in 2010, with a welcome focus on bending the curve of nature loss, rather than just halting its decline.

## Next steps for the Kunming-Montreal Global Biodiversity Framework

There's a lot to celebrate in what was agreed at COP15, but the true test of ambition will be what action governments take away from the scrutiny of the negotiating tables. Although the global community welcomed many aspects of the framework, there were also concerns that the final agreement lacked key details about the finance and tools required to actually meet the targets.

Any actions that countries take will also need to happen quickly. COP15 was originally due to take place in 2020, with the aim of adopting a 10-year framework for action up to 2030. With the framework only agreed at the end of 2022, there are now just 7 years to achieve the targets it contains. Delaying action will not only risk missing the targets and a repeat of the failure of the Aichi framework, but also risks further, potentially irreversible, damage to species and habitats in the meantime.

Following the talks, the first step for Parties has been to develop their National Biodiversity Strategies and Action Plans (NBSAPs) ahead of the deadline of COP16 at the end of 2024.

These documents should outline what actions each country will take to achieve the goals of the framework, reflecting the unique ecologies and challenges facing their region. The UK will submit a single NBSAP to the CBD as the four countries of the UK are represented as a single party at the talks. However, because the environment is a devolved policy issue, each country will be expected to come up with their own plans outlining how the 2030 targets will be met.

For the first time, Parties are also expected to submit 'National Targets' to the CBD, which will complement the more action-oriented nature of the NBSAPs. These are expected to align with the targets adopted in the Kunming-Montreal Global Biodiversity Framework and for countries with limited capacity to submit a full NBSAP, these will be regarded as an acceptable replacement.

Crucially, whilst submitting national plans and targets are an important part of creating accountability and focusing governments on what they need to achieve and how they will do it, they are not enough in isolation. Successfully meeting the 2030 mission and 23 targets will require actual delivery of the plans, with the necessary finance, action on the ground, and monitoring to ensure that progress is being made. Without this sustained effort in the years running up to 2030, warm words and ambitious NBSAPs will simply add hot air to the global conversation, risking a false sense of security and progress.

### Why action is needed now more than ever

Without urgent and significant action, the world's wild species, habitats and ecosystems face a dire future. The [5th Global Biodiversity Outlook](#) released in 2020 revealed that an average of around 25% of species in assessed animal and plant groups are threatened with extinction, and the [Living Planet Index](#) shows that wildlife populations have declined by 69% on average since 1970.

Closer to home, the latest [State of Nature](#) report showed that across the UK, species have declined on average by 19% since 1970, with even greater declines seen in insect populations. Nearly one in six species are threatened with extinction from Great Britain. This state of affairs is replicated across all four nations, with an average decline in species' abundance of 20% in Wales and 15% in Scotland since 1994. In Northern Ireland, the abundance of 17 farmland bird species has fallen on average by 43% since 1996. Species in England have declined in abundance by an average of 32% since 1970.

The report outlines the key drivers of this change, including unsustainable agricultural practices impacting our land, rivers and lakes. In our seas, unsustainable fishing practices and marine development pose a major threat to species and habitats. The impact of climate change and the increased frequency of extreme weather events is causing damage across both the terrestrial and marine environments, highlighting the inextricable relationship between the twin climate and nature crises.

## The current policy landscape

Any NBSAP that the UK submits ahead of COP16 in 2024 will need to establish how the four UK nations will meet the targets set out in the Kunming-Montreal Global Biodiversity Framework, including how nature will be incorporated into cross-sectoral policies and decision-making.

It is expected that the UK's NBSAP will comprise four individual country strategies as well as strategies for the UK Overseas Territories and Crown Dependencies, some of which have already been developed. England's contribution is likely to be the [Environmental Improvement Plan](#), published in 2022 as the first update to the 25-Year Environment Plan.

However, the EIP is far from a ready-made plan to slot into the NBSAP. The plan lacks important detail about how the Government will meet interim and long-term Environment Act targets, with little mention of how other Government targets will support action on nature as part of a cross-sector implementation effort. The plan also fails to set out key governance structures that will ensure progress continues to be made over the coming years.

Ahead of the UK NBSAP being published, Wildlife and Countryside Link has assessed to what extent the policy building blocks are in place **in England** to support the delivery of the 2030 KMGBF targets and where there are gaps. Importantly, this is a tracker looking at *policy progress*, not progress on the outcomes of the actual targets themselves. The latter will be carried out using agreed indicators and interim reports to the CBD in 2026, alongside other progress reporting moments such as the State of Nature reports.

Any gaps in policy measures that may result in the failure to meet the GBF targets should be clearly outlined in the forthcoming NBSAP, with a plan for how they will be filled. With only a few years to meet the targets, simply pointing to the gaps as part of a paper exercise will not be enough. For the UK's NBSAP to raise the bar and stand out at COP16, the NBSAP should also identify the potential barriers to meeting these targets so that they can be addressed and any risks minimised.

Of course, with the UK submitting just one NBSAP to the CBD on behalf of all four UK nations, it will also be essential to identify the policy gaps in Wales, Scotland and Northern Ireland. We address the four-country angle in more detail in the next section.

A summary of the ratings is outlined below with a key describing what each of the ratings means. We have taken into account policies, spending commitments and targets to inform these ratings, and to what extent the cumulative impact of these is likely to have on meeting the relevant target. For some of the targets that cover multiple policy areas, e.g. target 10 looking at sustainable management in agriculture, fisheries, and forestry, we have provided separate ratings for each of the different areas. For other targets, we have been unable to provide an assessment due to the limited availability of information. Importantly, we have still included these targets in the tracker and encourage the UK Government to address all 23

targets with equal importance in the run-up to 2030. More details supporting the rating process are included in the tables at the end of the report.

What is clear is that there is still a long way to go. None of the targets have been assessed as green, and many are red, indicating that significant improvements are required to policy measures in that area if we are to meet them. If the UK government is hoping to use the EIP as England's contribution to the UK's NBSAP, it must be strengthened to reflect these gaps.

## The analysis at a glance

### Key:

|                   |   |
|-------------------|---|
| <b>DARK RED</b> ● | Policies related to this issue are judged to have gone backwards in terms of progress                                       |
| <b>RED</b> ●      | Existing policies are unlikely to meet the target with little policy progress, significant improvements required            |
| <b>YELLOW</b> ●   | There has been some policy progress in this area with some examples of good policies, but more required to meet the target. |
| <b>GREEN</b> ●    | Existing policies, if delivered, are likely to meet the target  |
| <b>GREY</b> ●     | We have not been able to assess policy progress on this target  |

## GBF targets policy tracker for England – summary

|   |             |          |                         |        |
|---|-------------|----------|-------------------------|--------|
| 1. Spatial planning                     | Land        | Yellow   | 11. People and nature   | Red    |
|   | Marine      | Red      | 12. Urban areas         | Yellow |
| 2. Ecosystem restoration                | Land        | Red      | 13. Benefit sharing     | Grey   |
|   | Marine      | Red      | 14. Mainstreaming       | Yellow |
|   | Freshwater  | Red      | 15. Business and nature | Yellow |
| 3. 30x30 on land and sea                | Land        | Red      | 16. Consumption         | Red    |
|   | Marine      | Yellow   | 17. Biotechnology       | Grey   |
| 4. Species extinction                   |             | Red      | 18. Subsidies           | Red    |
| 5. Wildlife trade                       |             | Red      | 19. Finance             | Yellow |
| 6. Invasive species                     |             | Red      | 20. Capacity building   | Grey   |
| 7. Pollution                            | Nutrients   | Red      | 21. Information         | Yellow |
|   | Chemicals   | Dark Red | 22. Indigenous peoples  | Grey   |
|   | Plastic     | Yellow   | 23. Gender              | Grey   |
| 8. Climate and nature                   |             | Dark Red |                         |        |
| 9. Sustainable use                      |             | Red      |                         |        |
| 10. Agriculture, fisheries and forestry | Agriculture | Dark Red |                         |        |
|   | Fisheries   | Red      |                         |        |
|   | Forestry    | Yellow   |                         |        |

## Looking beyond Westminster - a four-country effort to restore nature

The policy tracker above addresses policy gaps in England only. However, it will be the responsibility of all four nations to meet the 2030 mission collectively as the UK.

In April 2021, the four UK Environment Links [published a report](#) outlining what the four Governments of the UK needed to do ahead of COP15 and in the following decade to ensure the success of the Global Biodiversity Framework. These covered key issues of 1) targets; 2) four-country collaboration; 3) implementation; 4) monitoring and reporting, and; 5) linking up action on climate and nature. We have revisited these recommendations in the post-COP15 context with an update on what will be needed to meet the goals and targets of the GBF.

### 1. Ambitious targets in law to support the GBF mission to halt and begin to reverse the decline of nature by 2030

The framework agreed by all parties at COP15 is an ambitious signal to protect and restore nature. Commitments made on the international stage may be appealing to signal good intent and to demonstrate that Governments are taking the nature and climate crisis seriously, but countries must turn this into real action. Setting ambitious domestic targets in law for nature will show that the four UK countries are serious about reversing biodiversity loss, with the accountability of a legal target. In the National Targets Template that the UK submits as part of its NBSAP, each country's contribution should at least align with the targets of the KMGBF, going further where possible.

### 2. Working together across the four nations to deliver a successful framework

Successfully meeting the GBF targets will require a collaborative approach between all four UK nations. Just as it will be impossible to meet global targets unless there is coordination between all parties, it will be challenging to meet the UK targets collectively as a whole unless each country plays its part.

As the UK NBSAP is put together, it will be important to ensure that the commitments made in each country add up to what the UK needs to deliver as a single party for the success of the global targets. Beyond the plan being published, ongoing collaboration between environment departments and nature agencies in each country will allow for a more efficient approach to meeting the targets, through the sharing of successful policy measures and shared lessons from failed approaches.

Just as conversations between the four UK nations will be an essential step in developing the UK NBSAP, there must be engagement with wider stakeholders as part of this process. This is important not only to ensure the robustness of the final plan and gain from the expertise of a wide variety of views, but also to respect the fact that much of the success of the targets will depend on delivery on the ground by many of these stakeholders.

### **3. Implement measures to ensure the success of the global biodiversity framework, including effectively protecting 30% of the UK's land and seas by 2030**

With a 10-year framework to be delivered in just 7 years, Parties to the CBD must take action as soon as possible to meet the goals of the GBF with ambitious domestic policies. Bold commitments have been welcomed, but it will be the day-to-day actions that will differentiate between those countries who signed up the framework as a quick win for the sake of appearances and those who signed up with a genuine determination to tackle the biodiversity crisis.

The UK NBSAP should set out the measures that will be taken in each of the four nations to tackle the drivers of biodiversity loss and begin to restore our degraded ecosystems and create nature positive economies. In order to drive meaningful change, the policies set out in the NBSAP should be sufficient to meet each of the 23 targets, with the required level of spending to deliver them.

Importantly, if the UK's NBSAP is to be truly world leading, it should offer something more than simply a rehashing of existing plans and commitments from each of the four nations. This includes identifying key gaps in existing policy measures that will risk missing the targets, with a plan for how they will be filled. An ambitious NBSAP that is serious about implementation should also include costed plans for delivery.

### **4. Develop and implement a robust monitoring, reporting, and verification framework to measure progress towards targets and goals**

The collective failure to meet the Aichi targets was in part due to a lack of monitoring framework to periodically assess to what extent parties were on track to meet the targets of the post-2010 framework. We cannot afford to see a repeat of this, and so it will be critical for the UK nations to develop a coordinated set of indicators to assess progress at regular intervals and adjust plans accordingly. These indicators should be externally reviewed to ensure robustness.

### **5. Linking up action on nature and climate**

The summer following the agreement of the KMGBF has been the [hottest on record](#), throwing into stark reality the fact that we not only face the challenge of solving the nature crisis, but also a climate crisis that is already affecting the lives of people across the world.

At COP28 this year, much of the focus has been on the first global stocktake, a review of global progress on climate action that should inform any necessary corrective action over the coming years. These revised plans will come at the same time as NBSAPs are being developed, providing an opportune moment to combine the two and implement measures that tackle both simultaneously, such as protecting and restoring robust ecosystems that provide resilience



against extreme weather events. It also allows for more integrated planning to minimise the trade-offs between measures taken to address the two crises. At this year's talks, the UK endorsed the [COP28 Declaration on Climate, Nature & People](#) which includes a commitment to “fostering stronger synergies, integration and alignment in the planning and implementation of national climate, biodiversity and land restoration plans and strategies”.

## Kunming-Montreal Global Biodiversity Framework – England Policy Tracker

### KEY:


**DARK RED:** Policies related to this issue are judged to have gone backwards in terms of progress.

**RED:** Existing policies are unlikely to meet the target with little policy progress, significant improvements required.

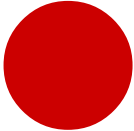
**YELLOW:** There has been some policy progress in this area with some examples of good policies, but more required to meet the target.

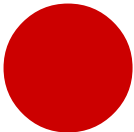
**GREEN:** Existing policies, if delivered, are likely to meet the target.

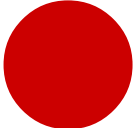
**GREY:** We have not been able to assess policy progress on this target but have included relevant information where possible.

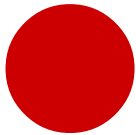
| TARGET   | RATING   | RATIONALE  |
|--|--|--|
| <p><b>1. Spatial planning</b></p> <p>Ensure that all areas are under participatory, integrated and biodiversity inclusive spatial planning and/or effective management processes addressing land- and sea-use change, to bring the loss of areas of high biodiversity importance, including ecosystems of high ecological integrity, close to zero by 2030, while respecting the rights of indigenous peoples and local communities.</p> | <p><b>Land</b></p>  | <p>There is no statutory tier of strategic or ‘larger than local’ land use planning in England, which would enable planning to take place on a geography closer to that at which ecological processes operate. However, the Government has committed (in the <a href="#">Environmental Improvement Plan</a>) to publishing a land use framework in 2023 which will set out ‘how [they] will balance multiple demands on our land including climate mitigation and adaptation.’</p> <p>However, it is not clear if this document will cover the multiple land uses which impact on nature, including farming and agricultural land and development. It is also not clear if the land use framework will genuinely influence change on the ground - a high-level policy document will not be effective in doing so. The land use framework must ensure the climate crisis and nature crisis are tackled at the same time - as the climate crisis is one of the driving factors behind biodiversity loss.</p> <p>Local Nature Recovery Strategies (LNRSs), which identify local biodiversity priorities and local nature recovery opportunity areas, developed by Responsible Authorities and covering the whole of England, have recently been introduced. There is now a legal link between LNRSs and the land use planning system through the Levelling Up and Regeneration Act, with local planning authorities now having a duty to ‘take account’ of LNRSs when producing local development plans.</p> <p>However, it is unclear how effective LNRSs, including through the new legal link to local development plans, will be on the ground at protecting existing and restoring potentially important local habitats. There is no mechanism to ensure LNRSs add up at a national scale. The Nature Recovery Network is a missed</p> |

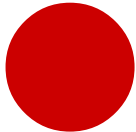
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|  |  | <p>opportunity by which to establish an evidence-based national assessment of where to deliver nature’s recovery and how to align with existing mechanisms and tools (e.g., ELM targeting and protected sites), rather than only relying on a bottom-up approach.</p> <p>Nature is poorly protected by the land use planning system, which regulates development and major infrastructure. Despite <a href="#">recent reviews of the NPPF</a>, the Government has foregone these opportunities to put Environment Act and Climate Change Act targets at the heart of the purpose of planning as set out in policy, alongside sustainable development. It has also further expanded permitted development regulations which enable development to take place with fewer checks and balances.</p> <p>National Policy Statements provide the framework within which Nationally Significant Infrastructure proposals are considered. These currently have no spatial component.</p> <p>The Government is planning to reform Strategic Environmental Assessment (SEA) and Environmental Impact Assessment (EIA) which embeds environmental considerations into specific plans and project proposals. These new Environmental Outcomes Reports (EORs) must not weaken any particular environmental protections, as well as the statutory requirement not to reduce the ‘overall level’ of environmental protection.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• The Government must publish a <a href="#">land use framework</a> that genuinely achieves land use change on the ground by docking into existing land use regimes and regulations, including the land use planning system and environmental permitting.</li> <li>• The Government must ensure the duty to take account of LNRSs is implemented well and with sufficient weight to ensure local development plans steer proposals away from key local nature sites.</li> <li>• The Government must put Environment Act 2021 and Climate Change Act 2008 targets at the heart of the planning system, as a purpose of planning in the NPPF.</li> <li>• Retain environmental protections via SEA and EIA in any reforms to EORs and improve implementation of environmental assessment, including by better embedding the mitigation hierarchy into strategic plans.</li> <li>• The Government should review National Policy Statements for major infrastructure, putting them on a spatial footing with impacts upon nature minimised.</li> </ul> |
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|                              | <p><b>Marine</b></p>  | <p>Despite the Marine Protected Area (MPA) network in England, damaging activities and proposals continue in these areas, including new oil and gas licences and the location of offshore wind infrastructure in highly sensitive marine areas. Damaging activities continue to occur in the wider marine environment, contributing to overall pressures on the seas.</p> <p>While Defra does have a Marine Spatial Prioritisation (MSPri) Programme underway, few outputs have been made available and there is no indication of when a process to evaluate pressures on the marine environment and strategically steer development and activities, including offshore wind projects, to the least damaging areas of the sea will become available.</p> <p>National Policy Statements provide the framework within which Nationally Significant Infrastructure proposals are considered on land and at sea. These currently have no spatial component. There are current proposals for a 'Critical National Priority' status for offshore renewable energy projects to trump other considerations including for nature and biodiversity.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• Set byelaws through the Marine Management Organisation (MMO) programme to halt damaging fishing activity across the Marine Protected Area (MPA) network by 2024. MPAs must be protected across the whole site rather than simply the designated features.</li> <li>• Deliver a new system of Marine Spatial Planning which assesses the carrying capacity of English Seas and prioritises the achievement of nature and climate targets, including through the protection of MPAs and the delivery of 30x30.</li> <li>• Address displacement, where protection measures simply push fishing activity elsewhere. This requires new assessments of overall fleet capacity and addressing these issues holistically.</li> <li>• The Government should withdraw its proposals to introduce a Critical National Priority status for energy infrastructure which override environmental considerations.</li> <li>• Provide Defra with a formal role in the planning system to ensure proper consideration of the mitigation hierarchy, including adequate provision of compensation for offshore energy infrastructure.</li> </ul> |
| <p><b>2. Restoration</b></p> | <p><b>Land</b></p>   | <p>There is currently no definition for 'degraded' ecosystems in the UK nor assessment. Consequently, it is not possible to know whether or how this target will be met. The GBF guidance states that degraded land includes natural ecosystems which have a loss of ecosystem functions and services and transformed</p>   |


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| <p>Ensure that by 2030 at least 30 percent of areas of degraded terrestrial, inland water, and marine and coastal ecosystems are under effective restoration, in order to enhance biodiversity and ecosystem functions and services, ecological integrity and connectivity.</p> |  | <p>ecosystems (such as agricultural areas) and that an assessment of degraded areas within a country is a necessary first step for monitoring the total percent of degraded ecosystems which are under restoration.</p> <p>Lack of definition includes whether this target is limited to the restoration of delineated areas of habitat (for example protected areas, ELM Landscape Recovery areas) or whether it extends more broadly to the restoration of ecosystems within farmed, productive and managed landscapes (for example, wildflower meadows, hedgerows, river corridors).</p> <p>Related, there is no EIP commitment nor plans to monitor and track progress against this target in England on land. There has been no assessment of degraded areas in England and no specific strategy to ensure degraded areas are under effective restoration.</p> <p>There has been very limited progress in designating further protected sites to ensure important habitats are under legal protection. The recommendations from the <a href="#">UK SPA Reviews from 2016 and from 2011</a>, which found critical gaps in England's protected sites network for many of our most vulnerable bird species, have not been implemented. In November 2021 the Government stated that it has 'developed an England implementation plan in liaison with Natural England' for these reviews but this plan does not appear to have been published or implemented.</p> <p>This target will be especially important in the face of climate change, which is one of the main drivers for loss and degradation of habitats.</p> <p>Depending on how it is defined, there are several policies and commitments which could have implications for delivering this target, including: EIP commitments to get degraded protected sites into recovering condition on the way to favourable condition, LNRs which will identify local nature recovery opportunity areas, the Nature Recovery Network, Landscape Recovery component of ELM which will restore for nature large landscape areas, policy protections for ancient woodland (included degraded ancient woodlands), the England Peat Action Plan, and <a href="#">new protections</a> for chalk streams under LURB, and an announced new Defra chalk streams recovery pack.</p> <p>If including restoration within farmed landscapes, other policies become relevant, including the SFI and Countryside Stewardship tiers of ELM.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• A definition and assessment of degraded land and inland water in England, and a strategy to ensure at least 30% of these areas are under effective restoration.</li> </ul> |
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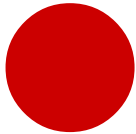
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|  |  | <ul style="list-style-type: none"> <li>• Set a legal target to ensure 75% of protected sites are in good condition by 2042. Expansion of protected site status could protect new freshwater sites, including all chalk streams.</li> <li>• Ensure sufficient funding and ambition for the Landscape Recovery component of ELM.</li> <li>• Strengthen policy protections for ancient woodland and expand the definition of irreplaceable habitats.</li> <li>• Implement the England Peat Action Plan, including by advancing the ban on horticultural peat (promised by 2024) and expanding the ban on heather burning on the uplands.</li> <li>• Effective action to mitigate and adapt to climate change (see Target 8 for more detail)</li> </ul>   |
|  | <p><b>Marine</b></p>  | <p>Firstly, there is no EIP commitment or plans to monitor and track progress against this target in England at sea. There has been no assessment of degraded areas in England’s seas and no specific strategy to ensure degraded areas are under effective restoration.</p> <p>There are several policies and commitments which could have implications for delivering this target, including: Marine Protected Areas (MPAs), Highly Protected Marine Areas (MPMAs), seagrass restoration commitments.</p> <p>However, despite the Marine Protected Area (MPA) network in England, damaging activities and proposals continue in these areas, including new oil and gas licences and the location of offshore wind infrastructure in highly sensitive marine areas. Damaging activities continue to occur in the wider marine environment, contributing to overall pressures on the seas.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• Set byelaws through the Marine Management Organisation (MMO) programme to halt damaging fishing activity across the Marine Protected Area (MPA) network by 2024.</li> <li>• Designate at least 10% of English seas in Highly Protected Marine Areas, where all damaging activities are restricted.</li> <li>• Provide the resources required for the effective monitoring and management of the MPA network, prohibiting all damaging activities and properly funding enforcement agencies to deliver conservation goals.</li> <li>• Work with The Crown Estate to ensure all upcoming seabed leasing for offshore wind development is located outside HPMAs and MPAs, offering greater protection for the marine environment and a smoother consenting process.</li> <li>• Design and implement a framework for Marine Net Gain (MNG) which requires all developments to contribute to the restoration of our seas.</li> </ul> |

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|  |  | <ul style="list-style-type: none"> <li>• Effective action to mitigate and adapt to climate change (see Target 8 for more detail).</li> </ul>   |
|  | <p><b>Freshwater</b></p>  | <p>The 2027 deadline to bring the majority of waters to Good Status under the Water Framework Directive (WFD) Regulations will soon pass, and the target will not be met. Good Chemical Status is not predicted to be achieved until 2063 and there is 'low confidence' that the majority of waters can be brought to Good Ecological Status by 2027. The repercussions of this failure are unclear in policy terms, and there is <i>still</i> no clear indication of how the framework will be evolved post-2027.</p> <p>Furthermore, WFD monitoring is under <a href="#">constant strain</a> due to significant funding and capacity gaps in EA.</p> <p>Due to REUL, the future of WFD is uncertain and Defra are exploring potential reform options. For example, <a href="#">the Plan for Water</a> (published April 2023) confirms Government intention to make changes to WFD, but offers no firm detail on what these changes will entail. Government and EA officials have clearly expressed intentions to reform the WFD, including the removal of the important 'one out, all out' rule that ensures a waterbody cannot be considered to be in good health unless all issues affecting it have been resolved - <a href="#">here</a> and <a href="#">here</a>, for example.</p> <p>We also lack an overarching (apex) target for water in the Environment Act. The <a href="#">4 water targets</a> are siloed, not sufficiently ambitious, and there is still no clear evidence or explanation of how they will be met or what the environmental outcomes will be - e.g. achieving the nitrogen pollution target assumes a huge boost in landowner compliance, yet offers no explanation or evidence on how this will be achieved. Beyond the Environment Act, there is a lack of clear detail on interim targets <a href="#">in the EIP</a>. Without an overall target for water health, the Government lacks a driver of holistic action; progress could be made against the 4 discrete water targets whilst the overall state of things does not improve, or even declines.</p> <p>Policies and commitments in the water space are undermined by the lack of agency/regulator funding and capacity to fully monitor, enforce and advise on legislation. For example, EA monitoring approaches are changing due to budget restrictions, which means that NE protected site assessments will be impacted. We cannot say the policy building bricks are in place if we do not have confidence that they will be fully implemented and enforced.</p> <p>Water Industry Business Plans for 2025-2030 are currently being assessed by the regulator Ofwat. They set out investment to tackle the industry's contributions to WFD failures (given the 2027 target), including</p> |

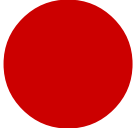
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|   |  | <p>on abstraction and wastewater, as well as upgrades to wastewater treatment works in the catchments of Protected Sites impacted by nutrient pollution, and significant investment to reduce Storm Overflow spills. However many would like to see increased ambition, but even if the plans remain as currently drafted, costs will be significant given past underinvestment and poor financial practices. This means that ambition may be watered down to reduce customer bills.</p> <p>We have seen policy commitments specifically on chalk streams, which is welcome - <a href="#">new protections</a> for chalk streams under the Levelling-Up and Regeneration Act 2023, and the announcement of anew Defra chalk streams recovery pack.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• Introduction of an apex water target under the Environment Act and clear delivery plans to ensure the 4 existing water targets can be met.</li> <li>• Increased funding and resources for regulators to monitor the state of waters, and to enforce legislation.</li> <li>• Commitment to not watering down the WFD, through reducing environmental ambition or through making this process less accountable (e.g. stripping out 'one out, all out').</li> <li>• Strong input from Ofwat, EA and NE to ensure water company plans deliver for the environment.</li> </ul> |
| <p><b>3. Conservation (30x30)</b></p> <p>Ensure and enable that by 2030 at least 30 percent of terrestrial and inland water areas, and of marine and coastal areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed through ecologically representative,</p> | <p><b>Land</b></p>  | <p>The Government has recently published its draft criteria and indicative 30x30 map on land in England. We welcome the Government publishing its roadmap to protecting at least 30% of land in England. However, the target is only meaningful if it comes with a plan and significant increase in public funding and regulation to restore two thirds of protected sites that are not in good condition. Realistic plans for restoring those sites to good ecological condition would be needed to ensure that the Government's figure of 8.5% represents real benefits for nature.</p> <p>Currently, <a href="#">only just over 3% of England's land</a> is effectively protected and managed for nature and could count towards this 30% target, if you take into account the condition of habitats in protected sites. While the Government has set out interim targets on the condition of protected sites, delivering this improvement will require a major increase in public funding and regulation.</p>  |

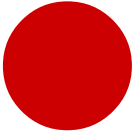


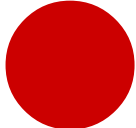
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| <p>well-connected and equitably governed systems of protected areas and other effective area-based conservation measures, recognizing indigenous and traditional territories, where applicable, and integrated into wider landscapes, seascapes and the ocean, while ensuring that any sustainable use, where appropriate in such areas, is fully consistent with conservation outcomes, recognizing and respecting the rights of indigenous peoples and local communities, including over their traditional territories.</p> |   | <p>Beyond protected sites, there has been no formal assessment of the potential for areas of land within protected landscapes not already designated as protected sites to contribute to 30x30. No OECMs have been assessed and recognised or reported on land in England.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• Publish a delivery plan to deliver 30x30 in line with international standards and an assessment process to evaluate and report on progress towards 30x30.</li> <li>• Improve and significantly expand the protected sites network on land, with large-scale capital and maintenance investment to improve the condition of the SSSI network, of which only 38% is currently in good condition.</li> <li>• Support protected landscapes' ability to contribute to 30x30 through strengthened Management Plans and Nature Recovery Plans for nature, including through a requirement for a local target for contributing to the national 30% target and a map and plan to achieve this target, alongside significantly increased funding.</li> <li>• Consult on and publish criteria for potential OECMs based on IUCN international guidance for case-by-case assessment of individual potential OECMs to demonstrate long-term protection, management for nature, and good biodiversity outcomes, in order to count towards 30x30.</li> </ul> |
|   | <p><b>Marine</b></p>  | <p>Currently, <a href="#">a maximum of 8% of English seas</a> could be said to be protected for nature against the most damaging forms of fishing activity, one of the primary drivers of marine biodiversity loss.</p> <p>Over the last year, three sites have been designated as Highly Protected Marine Areas: Allonby Bay, Dolphin Head, and North East of Farnes Deep. They cover just 0.42% of English waters and a further two proposed sites were not designated. Four offshore MPA sites have so far received protection from bottom-towed fishing gear through the Government's byelaw programme under the Fisheries Act 2020 and the Government has committed to implementing byelaws to manage fishing activity in all English offshore MPAs by 2024. This would be a positive step, but time remaining is now short.</p> <p>Many of the powers and structures required to achieve 30x30 at sea are in place, however existing protections must not be undermined (e.g., by new oil and gas licenses), and the speed and ambition of new designations and management measures needs to be significantly ramped up over the coming years.</p> <p><b>What is needed:</b></p>  |

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|  |  | <ul style="list-style-type: none"> <li>• Set byelaws through the MMO programme to restrict damaging fishing activity across the Marine Protected Area network by the end of 2024. MPAs must be protected across the whole site rather than simply the designated features.</li> <li>• Designate as an absolute minimum at least 10% of English seas in Highly Protected Marine Areas.</li> <li>• Conduct a sufficiency review to assess where the gaps remain so they may be addressed and ensure that the network of MPAs across English waters is ecologically coherent and truly supports species recovery. The last UK SPA Review published by JNCC highlights that ‘review of SPA provision in the marine environment is needed for at least 49 species’. This is particularly urgent given the continued failure to achieve GES for seabird populations and the catastrophic impacts of avian flu.</li> <li>• Greater understanding and mapping of blue carbon stores which can ensure that the most valuable ecosystems for marine carbon capture and storage are restored and protected. Future expansion of the MPA network should also be guided by climate considerations.</li> <li>• Deliver a new system of Marine Spatial Planning which assesses the carrying capacity of English Seas and prioritises the achievement of nature and climate targets, including through the protection of MPAs and the delivery of 30x30.</li> <li>• As on land, the Government should publish a map which outlines its principles and intentions for achieving 30x30 in the marine environment.</li> </ul> |
| <p><b>4. Species</b></p> <p>Ensure urgent management actions to halt human induced extinction of known threatened species and for the recovery and conservation of species, in particular threatened species, to significantly reduce extinction risk, as well as to maintain and restore the genetic diversity within and between populations of native, wild and domesticated species to maintain their adaptive potential, including through in situ and ex situ conservation and</p> |  | <p>The Government has set legally binding targets to halt the decline of species abundance in England by 2030 and to improve the GB Red List Index for species extinction by 2040 (compared to 2022 levels).</p> <p>In the Environmental Improvement Plan (EIP), the Government set out some species-specific interventions to help achieve these targets, including: a £25 million Species Survival Fund, implementing Species Conservation Strategies introduced by the Environment Act 2021, continuing the Species Recovery Programme, and actions through ELM. Species are not sufficiently embedded in other policies such as Local Nature Recovery Strategies (LNRs) (there has been guidance produced, but this remains optional) and Biodiversity Net Gain (BNG).</p> <p>However, while these interventions are welcome, there is likely to be a major shortfall on delivery. <a href="#">The OEP has concluded that</a> ‘progress on delivery of the 25YEP has fallen far short of what is needed to meet the Government’s ambition to leave the environment in a better state for future generations’. The OEP also pointed out that it is not clear if and how the policies and commitments in the EIP will add up to meet the species targets.</p>  |

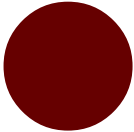
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| <p>sustainable management practices, and effectively manage human-wildlife interactions to minimize human-wildlife conflict for coexistence.</p> |  | <p>The farming transition will be key to delivery of the species abundance target, but it is likely to fall short on regulation and enforcement, due to the loss of cross-compliance, and on incentives, due to the watering down of ambition and funding for the Sustainable Farming Incentive (SFI).</p> <p>Climate change is one of the main drivers of species and biodiversity loss. However, the Government is not taking sufficient action to tackle climate change - the CCC has concluded that the Government is not currently on track to meet its own UK climate mitigation targets.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• A strategic and costed plan and the necessary increased investment to deliver and monitor progress towards the species abundance targets, including targeted species recovery.</li> <li>• Better species monitoring on land and at sea in England, especially of underrepresented taxa, including significantly increased resources and the right skills and expertise in Natural England and JNCC.</li> <li>• At least maintain and improve implementation of legal protection and management for all species currently listed in the Habitats Regulations (European Protected Species or EPS), with any impacts on local populations and wider meta-populations mitigated by robust, scientifically proven beneficial compensation measures.</li> <li>• We welcome the introduction of Species Conservation Strategies, but there must be clear and effective measures to halt declines and drive recovery at the pace and scale needed and with improved coordination and integration of existing mechanisms for species to maximise impact.</li> <li>• Revisit the recommendations of the EFRA report on species reintroduction, published in July 2023 but rejected by the Government in October, and implement its proposed measures to set priorities, manage risk and support landowners and communities to use scientifically driven reintroduction as a tool to advance species recovery.</li> <li>• Delivery of the England seabird conservation strategy and recovery pathway (ESCARP), which is delayed at least a year in its delivery. The current results of the seabird census indicate a 50% decline in seabirds across the UK, creating a more urgent need to deliver upon this strategy.</li> <li>• Triple the INNS biosecurity budget to £6 million, as per the Environmental Audit Committee's 2019 recommendations.</li> <li>• ELM ambition and the allocation of funding must be increased in order to deliver significant benefits for species on land and contribute to the achievement of species targets.</li> <li>• Address bycatch and a lack of fisheries monitoring through mandatory use of innovative technologies including Remote Electronic Monitoring (REM) with cameras on all vessels in English</li> </ul> |
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|   |   | <p>waters, including smaller vessels, and implement the recommendations from the EFRA Committee’s report on Marine Mammals.</p> <ul style="list-style-type: none"> <li>• Effective action to mitigate and adapt to climate change (see Target 8 for more detail)</li> </ul>   |
| <p><b>5. Wildlife Trade</b></p> <p>Ensure that the use, harvesting and trade of wild species is sustainable, safe and legal, preventing overexploitation, minimizing impacts on non-target species and ecosystems, and reducing the risk of pathogen spillover, applying the ecosystem approach, while respecting and protecting customary sustainable use by indigenous peoples and local communities.</p> |  | <p>The UK Government is not doing enough to reform harmful wild species harvesting practices.</p> <p>Brown hares are a protected species declining in abundance. The Government permits legal shooting of hares all year round leading to a double blow to hare populations, with losses from animals killed directly being matched by the consequent mortality amongst infant hares (leverets) orphaned in the breeding season.</p> <p>Worryingly, the Government has also explored proposals for a renewed unsustainable harvesting practice. In 2022, they consulted on proposals to allow young birds of prey to be taken from the wild for use in falconry. Given the threatened status of birds of prey species, this harvesting of wild species for recreational use is not sustainable and <a href="#">should be ruled out</a>.</p> <p>UK fish stocks are not being sustainably harvested. Analysis by CEFAS has shown that, since 2020, only <a href="#">34-35%</a> of baseline Total Allowable Catches in the UK have been at a level consistent with Maximum Sustainable Yield advice from the International Council for the Exploration of the Sea. A <a href="#">recent study</a> by Hull University for the IUCN found that species of fish are at risk of extinction in Britain’s waters, including the iconic Atlantic salmon.</p> <p>The Government has failed to act on credible reports of illegal wild species harvesting on land on a significant scale, concerning the hunting of foxes with dogs. In the words of the National Police Chiefs’ Council lead on the illegal hunting of foxes “<i>trail hunting has been used as a smokescreen for continuing illegal hunting</i>”. This led to the Scottish Government to ban trail hunting in 2023. The UK Government should follow this lead and <a href="#">ban trail hunting in England</a>, upholding the Hunting Act 2004.</p> <p>The Government has failed to reform harvesting practices connected to game shooting which have harmful impacts on non-target species and wider ecosystems. 50,000-100,000 wildfowl in the UK (c. 1.5-3.0% of the wintering population) are now estimated to die unnecessarily as a direct result of lead poisoning, from pollution caused by lead ammunition use in game shooting. The Government has been exploring a ban for the past three years, meanwhile lead ammunition continues to be widely used – a <a href="#">ban should be swiftly brought forward</a>. Game shooters also practice heather and grass burning, to create the optimum conditions for game populations. This burning devastates ecosystems and releases carbon and should be <a href="#">banned</a>.</p> |


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|  |   | <p>A further practice linked to game shooting increases the risk of pathogen spillover but has yet to be addressed. Over 50 million pheasants (raised in close confinement) are released each year to be shot as game, despite the risk that these introductions could worsen the avian flu pandemic affecting wild bird populations.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• A <a href="#">time limited shooting season</a> for brown hares should be introduced, to prevent shooting in the breeding season, ensuring ongoing sustainable harvesting of this wild species.</li> <li>• The Government should rule out wild take licencing for native bird of prey species.</li> <li>• In the fishing industry, all Total Allowable Catches should be reduced to sustainable levels and action plans should be prepared to save fish species threatened with extinction.</li> <li>• The UK Government should follow Scotland’s lead and <a href="#">ban trail hunting in England</a>.</li> <li>• The Government should ban the use of lead ammunition in game shooting and ban the practice of heather and grass burning as part of game bird breeding.</li> <li>• The Government should act to <a href="#">limit game bird releases</a> while avian flu remains a threat.</li> </ul> |
| <p><b>6. Invasive species</b></p> <p>Eliminate, minimize, reduce and or mitigate the impacts of invasive alien species on biodiversity and ecosystem services by identifying and managing pathways of the introduction of alien species, preventing the introduction and establishment of priority invasive alien species, reducing the rates of introduction and establishment of other known or potential invasive alien species by at least 50 per cent by 2030, and eradicating or controlling</p> |  | <p>We have an Invasive Non-Native Species (<a href="#">INNS</a>) <a href="#">inspectorate</a> currently in a 3-year trial period, which is positive. However, there has been no confirmation of this inspectorate being extended or secured permanently (there have been no public updates on the work of the inspectorate since Spring 2022). The inspectorate is also underfunded, under-staffed, and under-resourced given the scale of the threat INNS pose, and compared to other biosecurity departments e.g. animal health. The power of the inspectorate is very limited, with inspectors only able to act if the species is already listed under the Invasive Alien Species (IAS) Regs as an INNS. This listing process is very slow and insufficiently reactive to respond to new INNS on the horizon - this means the inspectorate is effectively powerless to act on preventing future threats.</p> <p>The INNS issue remains very siloed and separate to the wider biosecurity agenda, and awareness of the scale of the problem remains low in Government. E.g. The <a href="#">Plant biosecurity strategy for Great Britain (2023 to 2028)</a> (published January 2023) explicitly states that invasive species are not within scope, despite there being significant cross-over and relevance.</p>       |

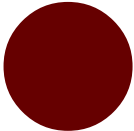
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| <p>invasive alien species, especially in priority sites, such as islands.</p>   |   | <p>The delivery of the GB INNS Strategy is dependent on Pathway Action Plans that are still not published and have been repeatedly delayed for years. Some of the Pathway Action Plans are already out-of-date, before they have ever been finalised and published (as they are supposed to be live documents, updated every five years, but five years has already passed before the draft Plans have even been signed off and published).</p> <p>IAS Regs are the only legislation we have for INNS biosecurity and preventing the introduction of new INNS. This is also where all the inspectorate powers and mandate are taken from. However, IAS Regs are Retained EU Law (REUL), so technically could be weakened or scrapped entirely.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• The future of the INNS Inspectorate should be secured permanently, beyond the 3-year trial.</li> <li>• INNS inspectorate needs to have more funding, on-par with the other biosecurity inspectorates.</li> <li>• The INNS inspectorate should be given greater powers to carry out its work.</li> <li>• Publication of all Pathway Action Plans.</li> </ul>   |
| <p><b>7. Pollution</b></p> <p>Reduce pollution risks and the negative impact of pollution from all sources by 2030, to levels that are not harmful to biodiversity and ecosystem functions and services, considering cumulative effects, including: (a) by reducing excess nutrients lost to the environment by at least half, including through more efficient nutrient cycling and use; (b) by reducing the overall risk from pesticides and highly hazardous chemicals by at least half, including</p> | <p><b>Reducing excess nutrients</b></p>  | <p>The UK government is not doing enough on reducing excess nutrients and the pollution that emanates from those nutrients that are lost to the environment. The poor management of nitrogen oxides, nitrates, ammonia and phosphorus means that they remain at damaging levels for biodiversity and public health, and nitrous oxide emissions from fossil fuels and fertiliser manufacturing remains a further urgent problem due to its contribution to climate change. There are not sufficient policy building blocks for addressing these issues at the holistic scale or pace required.</p> <p>The build-up of these nutrients and pollutants in the environment is a direct threat to English biodiversity. However, the existing regulatory frameworks require significant and rapid improvements - with certain policies either going backwards or requiring urgent updating. The Government has set 2030 voluntary reduction targets for ammonia emissions, which amounts to a 16% reduction over 25 years, falling significantly short of the scale of reduction required by Target 7. None of the ammonia commitments in the 2019 Clean Air Strategy have been delivered. Regulations on ammonia and slurry nutrient management regulations have not yet come to fruition, and uncertainty remains as to their delivery after delays to updates.</p> |

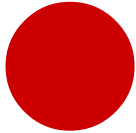
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| <p>through integrated pest management, based on science, taking into account food security and livelihoods; and (c) by preventing, reducing, and working towards eliminating plastic pollution.</p> |  | <p>The Environment Act requires the Government to address river pollution and air quality, but its air quality targets are limited to PM2.5 and do not include other pollutants, and achieving the agricultural water pollution target requires monumental shifts in compliance along with significant improvements in nutrient and soil management, for which there is no delivery plan. Synthetic fertilisers are also poorly regulated in the current legal and policy framework as the ELM schemes do not incentivise the transition to less harmful alternatives and the Government is yet to publish a strategy for reducing reliance on manufactured nitrogen fertilisers.</p> <p>The Environmental Improvement Plan 2023 includes an interim target to reduce nitrogen, phosphorus and sediment pollution from agriculture into the water environment by 10% by 2028 compared to the 2018 baseline, towards the Environment Act target of 40% by 2038. The Farming Rules for Water remain poorly enforced and have not prevented pollution from agricultural run-off containing synthetic fertilisers and chemicals from other farming techniques such as manure, slurry, agricultural plastics and biosolids - which is a direct risk to biodiversity in watercourses.</p> <p>There have also been previous threats to nutrient neutrality through the Levelling Up and Regeneration Bill. Although the acute threat has subsided with rollbacks left out of the King's Speech, the building blocks for a cohesive Government effort on nutrient neutrality remain uncertain.</p> <p>There are also gaps in terms of farms applying organic waste and other nutrient polluting activities outside the Habitats Regulations and nutrient neutrality zones, meaning there is limited ability to control the nutrient pollution that emanates from intensive livestock units and other developments which are outside of these areas.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• An integrated, whole systems approach to nutrient pollution across all relevant government departments.</li> <li>• General regulatory requirements (a regulatory baseline) for all farms are required to reduce nutrient pollution. Reductions could be achieved through catchment-level nitrogen budgets, implemented through farm-level nitrogen budgets - all nested within a national nitrogen budget.</li> <li>• Scaled up ambition for national statutory targets (i.e. within the EIP and the Clean Air Strategy) in line with halving nitrogen pollution by 2030.</li> </ul> |
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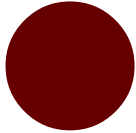
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|  | <p><b>Pesticides and Hazardous Chemicals</b></p>  | <p>Following Brexit, the UK has established an independent chemicals and pesticides regulatory regime. However, there have been significant rollbacks in chemicals regulation compared to the former regime under EU REACH and related pesticides regulations.</p> <p>On hazardous chemicals: The UK is initiating fewer and weaker protections for health and the environment compared to the EU. Its policy of divergence and establishing a standalone system separate from EU REACH means that there are significant risks to biodiversity, and the UK is falling behind from its EU counterpart (Since Brexit, 8 rules have been adopted and 17 initiated by the EU - whereas the UK has not banned any substances in that time and only two restrictions are being considered). The Regulatory Management Option Analysis on the forever chemicals, PFAS, recommends PFAS restrictions under UK REACH which is welcome, but the range is narrow. UK Chemicals Strategy has been repeatedly delayed, and although the Government has continued to promise delivery in 2023, it is unclear when this will happen.</p> <p>The recent UK REACH Alternative Transitional Registrational Model (ATRm) plans indicate that the Government plans to reduce the hazard information that chemicals companies must provide to register substances in the UK and safety information to an irreducible minimum.</p> <p>On pesticides: The National Action Plan on the Sustainable Use of Pesticides has yet to be released. Neonicotinoids have been progressively banned in the UK, with a near complete ban on three of the most toxic ones entering into force in 2018. However, against the advice of the Expert Committee on Pesticides, the Government has also repeatedly granted emergency derogations of banned neonicotinoids for use on crops, which have proven impacts on bees, pollinators, and wildflowers. A small positive is that there are Integrated Pest Management options in place under ELM (SFI), however these may be limited in efficacy by the lack of a joined up whole farm approach or access to good quality advice.</p> <p>Some pesticides and neonics are still used in veterinary medicines and by local authorities to control weeds in urban areas, which are not appropriately regulated. Like agricultural pesticides, these pesticides form part of chemical cocktails polluting watercourses and environments due to direct contamination and run-off.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• A stable, alignment-based model to address the above problems and close the protective divide that is opening with EU REACH, which risks becoming a chasm.</li> </ul> |
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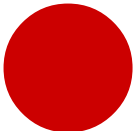
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|  |   | <ul style="list-style-type: none"> <li>• A comprehensive PFAS Action Plan to protect people and nature.</li> <li>• Binding pesticide reduction targets, to reduce the use and risk of chemical pesticides significantly by 2030.</li> <li>• The use of pesticides should be banned in sensitive areas, including protected sites and in public areas.</li> <li>• Development of PFAS and hazardous chemicals free alternatives and incentivize alternatives to toxic pesticides.</li> <li>• Better systems and resourcing for monitoring and enforcement of chemical pollution.</li> </ul>  |
|  | <p><b>Plastic</b></p>  | <p>In the 2018 Resources and Waste Strategy, Defra set out its commitment to ensure that those responsible for creating polluting products pay for the cost of that pollution through the ‘polluter pays principle,’ introducing a series of Collection and Packaging Reforms (CPRs) to prevent polluting plastic entering the environment in the first place.</p> <p>However, over the last year these CPRs have ground to a halt. The Government announced it would not be including glass bottles in its flagship Deposit Return Scheme and progress towards appointing an Extended Producer Responsibility Administrator is slow. Without properly implementing these policies, thousands more plastic items will end up polluting our streets and seas. Defra has also failed to fully explore the possibility of litter payments for those producing the most commonly littered items on land. Rather than ensuring the companies who produce the pollution contribute towards its removal, the Government has decided to further burden Local Authorities with finding a solution to this problem. Defra has gone some way to removing the most polluting items of plastic from the market. Recent bans on single-use plastic straws, cotton buds, plates etc are welcome but more needs to be done to ensure there are fewer plastic materials in the system to become pollution and more to reduce polluting disposal in the first place.</p> <p>Across our oceans, marine plastic pollution is still rife. The Government has been a strong voice supporting the negotiation of a legally binding global treaty to end plastic pollution. However, more needs to be done to tackle plastic pollution within the context of our over-consumption of resources, avoiding the unintended consequences of material switching.</p> <p><b>What is needed:</b></p> |


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|   |   | <ul style="list-style-type: none"> <li>• An ambitious legally binding global treaty to end plastic pollution of all types.</li> <li>• As part of the EPR Scheme, the Government should reconsider litter payments for producers of the most commonly littered items.</li> <li>• A comprehensive package of policies to support increased plastic reuse to prevent polluting materials occurring at the source.</li> <li>• Quicker delivery of the EPR and DRS which once implemented will be essential to tackling the most commonly polluting/littered items.</li> </ul>   |
| <p><b>8. Climate</b></p> <p>Minimize the impact of climate change and ocean acidification on biodiversity and increase its resilience through mitigation, adaptation, and disaster risk reduction actions, including through nature-based solution and/or ecosystem-based approaches, while minimizing negative and fostering positive impacts of climate action on biodiversity.</p> |  | <p>Although the UK has committed to achieving Net Zero emissions by 2050, recent policy developments are likely to hinder the UK's progress in meeting this target and represent a backwards step on action towards tackling the climate crisis. For example, in September 2023 the government announced that it was pushing back the 2030 ban on petrol and diesel cars to 2035. New oil and gas licences are permitted, despite clear evidence to suggest that continued fossil fuel expansion is not compatible with efforts to keep global warming to 1.5C, warnings supported by the IEA. With climate change as a major driver of biodiversity loss globally, the UK's failings on climate will lead to negative impacts on species and habitats both in the UK and globally, including through the impact of extreme weather events and ocean acidification.</p> <p>The UK has acknowledged the importance of nature-based solutions to address the impacts of climate change, for example through the Nature for Climate Fund. The government's Net Zero Strategy also included a section on land use, but contained little detail about how the sector would support meeting the UK's net zero emissions target. The Climate Change Committee has consistently highlighted agriculture and land use as "weak links" in the Government's plans for cutting emissions.</p> <p>The Government published its 3rd National Adaptation Programme in July 2023, which sets out a five year plan for how the Government will deal with extreme weather events as a result of global temperature rise. The programme acknowledges the importance of natural ecosystems in increasing resilience of communities and infrastructure to these extreme weather events. However, NbS are not well represented enough in NAP3 as a route to achieving adaptation so this needs to be much stronger in future adaptation plans, delivery of NAP3, and private market incentives, for example. Similarly, there is only one passing reference to ocean acidification in NAP3 so it does not seem to be given sufficient enough consideration from the adaptation side either.</p> <p>There are some points in NAP3 about reducing non-climate pressures on coastal and marine habitats which is positive in terms of resilience, but this needs to go further (the new statutory target of 70% of</p> |

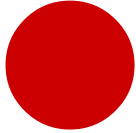
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|   |   | <p>designated features in MPA network to be in favourable condition by 2042 is so far off and not ambitious enough) and must now be delivered on (e.g. more HMPA sites).</p> <p>At UNFCCC COP28 this month, the UK Government endorsed a <a href="#">joint statement on Climate, Nature and People</a>. This contains a commitment to “fostering stronger synergies, integration and alignment in the planning and implementation of national climate, biodiversity and land restoration plans and strategies, with specific emphasis on ambition, comprehensiveness and coherence between the next round of Nationally Determined Contributions (NDCs), updated National Adaptation Plans (NAPs), and forthcoming revised National Biodiversity Strategies and Action Plans (NBSAPs)”.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• The Government should halt the licensing and approval of new offshore oil and gas extraction.</li> <li>• Increase funds available through the Nature for Climate Fund for nature-based projects that address climate change mitigation and adaptation and supporting nature’s recovery simultaneously.</li> <li>• Robust, government-backed standards for voluntary carbon markets, including demand-side standards to ensure high integrity markets and the avoidance of greenwashing or poor-quality offset schemes.</li> <li>• Provide greater detail and guidance to farmers and land managers about reducing land-based emissions and increasing nature-based removals.</li> <li>• Increased support for nature-based approaches to adaptation, including increased funding and developing a robust evidence-informed Monitoring and Evaluation framework.</li> <li>• Ensure all parts of government are involved and collectively responsible, and engaged with devolved nations, to ensure a coordinated and integrated response to climate change and biodiversity across the UK. The Climate Resilience Board (outlined in NAP3) should play a key role in ensuring this.</li> </ul> |
| <p><b>9. Sustainable use</b></p> <p>Ensure that the management and use of wild species are sustainable, thereby providing social, economic and environmental benefits for people,</p> |  | <p>The UK Government is failing to manage wild species in a way that ensures they will provide benefits to people in the long term. The 2023 <a href="#">State of Nature</a> report provided an authoritative stocktake on the state of UK wildlife, drawn from extensive biological monitoring. It shows a long-term decline in the average abundance of terrestrial and freshwater species of 19% since 1970, with a short-term decline of 3% between 2010 and 2020.</p>   |

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| <p>especially those in vulnerable situations and those most dependent on biodiversity, including through sustainable biodiversity-based activities, products and services that enhance biodiversity, and protecting and encouraging customary sustainable use by indigenous peoples and local communities.</p>   |  | <p>To address this decline, wild species need more wild spaces to thrive and recover in. The Government has promised to protect 30% of land and sea for nature by 2030 to prove this but has made limited progress – currently only 3% of land and 8% of sea is protected.</p> <p>At sea, fisheries activity must be assessed and improved. Displacement, where protection measures simply push fishing activity elsewhere, must be addressed. This requires new assessments of overall fleet capacity and addressing these issues holistically.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• An urgent <a href="#">acceleration of progress towards 30x30</a> to secure the protected wild spaces required for sustainable use of wild species.</li> <li>• A new system of marine spatial planning and prioritisation, to manage conflicts emerging from the growing number of activities at sea. This spatial planning and prioritisation system should ensure that fishing displacement from protected sites does not result in unsustainable pressures on other sensitive species or habitats.</li> </ul>   |
| <p><b>10. Sustainable agriculture, aquaculture, fisheries and forestry</b></p> <p>Ensure that areas under agriculture, aquaculture, fisheries and forestry are managed sustainably, in particular through the sustainable use of biodiversity, including through a substantial increase of the application of biodiversity friendly practices, such as sustainable intensification, agroecological and other innovative approaches, contributing to the resilience and long-term efficiency and productivity of these production</p> | <p><b>Agriculture</b></p>  | <p>Agriculture and associated land use change for farming has been a key driver of biodiversity loss in England. The UK Government has been progressively rolling out significant agricultural changes following Brexit and the exit from the EU Common Agricultural Policy.</p> <p>The enabling legal framework of the Agriculture Act 2020 and the ambitions set out in the Environment Act 2021, 25 Year Environment Plan, Health &amp; Harmony paper, and the Environmental Improvement Plan 2023 have set a framework to make agriculture more sustainable, benefiting on-farm biodiversity. The Agricultural Transition Plan is in place and sets out a series of actions to achieve the Government's goal of having around 70% of farmers in the Environmental Land Management Schemes by 2028. The Environmental Improvement Plan also commits to a target of 65-80% of land managers and farmers to adopt nature friendly farming on at least 10-15% of their land by 2030. However, the different policies are not well integrated and are not ambitious or resourced enough to meet these commitments.</p> <p>Defra has still yet to confirm the final ELM offer, consequently it is not yet possible to determine whether it will be sufficient to support the delivery of the GBF targets. However, there are too many low-ambition elements of SFI and consistent delays, goalpost movement, lack of appropriate investment, advice and training for whole farm and agroecological approaches means these schemes are a missed opportunity for nature. For example, farmers are being offered less for managing species-rich grasslands than they would</p> |


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| <p>systems, and to food security, conserving and restoring biodiversity and maintaining nature's contributions to people, including ecosystem functions and services.</p> |   | <p>get on the same land for short term herbal leys of minimal conservation value, risking the loss of this rare and irreplaceable habitat. Much needed regulations on nutrient management (including slurry) and the protection of vital natural assets such as hedgerows, soils, air and water are missing. Enforcement of existing farm regulations is poor, with high levels of non compliance.</p> <p>Peatlands are sensitive locations for highly specialised habitats and species. The Government is actively promoting the use of lowland peatland for sustainable farming via the Paludiculture Exploration Fund. Work also continues on the Peatland Code.</p> <p>The Government has released its Food Strategy. Although 1.1 and 1.2 outlines food security and sustainable production, the strategy does not integrate the full recommendations of the National Food Plan and largely focuses on security and productivity as opposed to agroecological approaches.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• The UK Government is right to move to a "public money for public goods" approach but needs to go much further to invest in and enable innovative, biodiversity friendly practices.</li> <li>• ELM must be joined up with the Environment Act and other targets in an effective way, with other metrics of success (beyond uptake) becoming delivery focal points (e.g., landscape recovery, wildlife habitat in 10% of farmed area).</li> <li>• More funding is required to shift production techniques away from intensive models towards agroecological approaches.</li> <li>• The Government also needs to fund high-quality independent advice and facilitation.</li> <li>• The regulatory baseline (which is uncertain following the loss of cross compliance and riddled with gaps) needs to be supported by funding for strong regulators and regulations must be better connected to the standards outlined in SFI and injected with ambition to prevent uncertainty and harm to biodiversity.</li> </ul> |
|   | <p><b>Aquaculture and fisheries</b></p> | <p>The 25Y Environment Plan for England outlines the Government's commitment to ensure that all fish stocks are recovered to and maintained at levels that can produce their Maximum Sustainable Yield (MSY). This commitment is supported by similar initiatives in the International Council for the Exploration of the Seas (ICES) and Sustainable Development Goals (SDG). Out of the 45 stocks that are MSY assessed and targeted by the UK, 14 remain below target with little indication from the Government on how sustainable fishing of these stocks is going to be achieved. In the 2018 Fisheries White Paper, Defra committed to adopting catch limits or other precautionary management measures where data is insufficient to have an</p>  |



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|  |  | <p>MSY-based assessment, although there is little evidence of progress here either. The UK urgently needs to fish below MSY which is almost 36 years post UNCLOS requirement.</p> <p>Through the Fisheries Act 2020 and the Joint Fisheries Statement (JFS), the UK has recognised the need to minimise and, where possible, eliminate bycatch of sensitive marine species, but progress is slow. Continued <a href="#">Government delays</a> in progressing measures to address by-catch offset significantly limit progress. This delay is further amplified by glacial progress in the expansion of Remote Electronic Monitoring in English waters. The voluntary approach to ERM, with blanket exclusion of the under-10m fleet, which accounts for 85% of English fishing vessels, means the policy is far less comprehensive than necessary to achieve its intended results.</p> <p>Furthermore, after quota negotiations with the EU, UK fishing quotas <a href="#">increased in value</a> in 2023 (by £34 million, compared to the year before). <a href="#">Statements made</a> in the House of Commons (but not yet confirmed beyond it) suggest that there has been a limited increase in sustainability of that quota, with 40% of total allowable catches in 2023 being consistent with ICES' advice, compared with 34% in 2022.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• A duty to set fishing limits below the maximum sustainable yield exploitation rate (FMSY) in all fish stocks to restore and maintain fish stocks above biomass levels that can produce maximum sustainable yield.</li> <li>• Where the data is insufficient to have an MSY-based assessment, include a duty to adopt catch limits according to the best available scientific advice that conserve those stocks while data is improved.</li> <li>• A closure to the UK sandeel fishery to support predator needs.</li> <li>• A duty to implement the ecosystem-based approach to fisheries management, so as to ensure that negative impacts of fishing activities on the marine ecosystem are minimised and ensure that aquaculture and fisheries activities avoid the degradation of the marine environment. This will also contribute to achieving Good Environmental Status.</li> <li>• Limitations on by-catches (catches of unwanted or non-target species).</li> <li>• A Government commitment to the swift delivery of mandatory programme of REM across all fleet sizes, starting with vessels using gillnets, to address the issue of bycatch and increase fisheries monitoring.</li> </ul> |
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|  | <p><b>Forestry</b></p>  | <p>The England Tree Strategy and EWCO offer are both positive, but clearer plans are needed for the transition from EWCO and Nature for Climate Fund to ELM. This is also relevant to Target 8 on climate.</p> <p>It remains to be seen how the Forestry Commission's <a href="#">new approaches</a> to mapping and recently announced plans for a 'presumption in favour' for some forestry projects will work in practice (also relevant to target 1 on spatial planning).</p> <p>Welcome commitments have been made in Defra's '<a href="#">Keepers of Time</a>' policy, including to maintain the existing area of Ancient Woodland and resource of Ancient and Veteran Trees; restore a majority of plantation on ancient woodland (PAWS) sites by 2030; and to return 75% of woodland SSSIs to favourable condition by 2042; however it remains to be seen how these will be implemented by the Forestry Commission and Planning Authorities. Moreover, the success of this target is reliant on grant uptake which is currently inadequate. For example, in 2022/2023, Government only had an uptake of 1 hectare into their PAWs grant in England out of about 140k ha of damaged ancient woodland.</p> <p>We welcome Forestry England's commitment to the UK Woodland Assurance Standard. For private woodland, despite a small increase in uptake of the certified UK Woodland Assurance Standard in the last year, over the longer term uptake has been <a href="#">declining in England</a>.</p> <p>The Government does not sufficiently monitor compliance or enforce their own minimum sustainability standards for forestry outlined within the UK Forestry Standard, which means they are heavily relying on voluntary certification and uptake of grants to deliver the majority of minimum sustainability standards in forestry.</p> <p>Restoration of woodlands as Wildlife Rich Habitat was not part of Defra modelling for delivery of biodiversity targets, but the latest round of Landscape Recovery Schemes <a href="#">reported plans</a> for around 3x extent of woodland management (20kha) as creation (7kha), indicating woodland restoration may have an important role in Nature Recovery Network delivery.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• Full statutory protection of Ancient Woodlands (equivalent to SSSIs).</li> <li>• Restoration of all PAWS sites.</li> <li>• Support for the buffering and reconnection of Ancient Woodland fragments, including extended (100m) buffers to provide space for natural colonisation.</li> </ul> |
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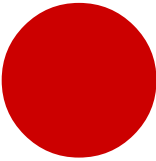
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|  |   | <ul style="list-style-type: none"> <li>Government should commission a review of UK Forestry Standard compliance on the ground, beyond areas within grant schemes.</li> </ul>   |
| <p><b>11. Nature's contributions to people</b></p> <p>Restore, maintain and enhance nature's contributions to people, including ecosystem functions and services, such as the regulation of air, water and climate, soil health, pollination and reduction of disease risk, as well as protection from natural hazards and disasters, through nature-based solutions and/or ecosystem-based approaches for the benefit of all people and nature.</p> |  | <p>Policies ensuring a healthy natural environment for all people to benefit from and enjoy are embedded in the Environmental Improvement Plan and in the National Adaptation Plan. However, the <a href="#">OEP</a> and the <a href="#">CCC</a> dispute whether these plans and policies will genuinely add up to achieving the Government's environmental and climate targets, providing people with the environment they need.</p> <p>In some areas, the Government is going backwards. The Government has recently used its powers under the REUL Act to revoke the National Emission Ceilings Regulations, which the <a href="#">OEP has stated</a> will result in a regression in environmental law around air pollution. ClientEarth <a href="#">has highlighted</a> why the revocation of the NEC Regs will result in a loss of accountability and transparency around improving air quality for nature and people.</p> <p>In other areas, we welcome the Government's commitments and policies which embed people specifically into nature policies, including the EIP pledge to ensure all people have access to a green or blue space within 15 minutes of home, and the development of a new Green Infrastructure Framework. However, the Government must go further and faster in these areas. There are currently no policies designed to deliver the EIP 15 minute commitment. The GI Framework, including Standards, is voluntary, not mandatory, which is not likely to result in much change in new development.</p> <p>There is also a nod to Nature-Based Solutions in the third National Adaptation Programme but it does not go much further than this and nowhere near as far as necessary to help restore biodiversity and reverse declines (and no new commitments).</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>The Government should rethink its decision to repeal the NEC Regulations at the end of 2023.</li> <li>A strategic and well-funded approach to ensure delivery of the commitment for all people to have access to nature within a 15 minute walk of home, including through funding and support for local</li> </ul> |




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|   |   | <p>authorities to develop and implement local Green Infrastructure Strategies and new requirements for developers to meet Green Infrastructure Standards in all new development.</p> <ul style="list-style-type: none"> <li>• Introduce a new Environmental Rights Bill which creates a new legal right to a healthy natural environment for all.</li> </ul>  |
| <p><b>12. Urban areas</b></p> <p>Significantly increase the area and quality, and connectivity of, access to, and benefits from green and blue spaces in urban and densely populated areas sustainably, by mainstreaming the conservation and sustainable use of biodiversity, and ensure biodiversity-inclusive urban planning, enhancing native biodiversity, ecological connectivity and integrity, and improving human health and well-being and connection to nature, and contributing to inclusive and sustainable urbanisation and to the provision of ecosystem functions and services.</p> |  | <p>There are several policies in place to increase and improve biodiversity and access to green and blue spaces in urban areas in England, but the Government must go further in policy to ensure they genuinely deliver for people and nature.</p> <p>For example, Biodiversity Net Gain is the requirement for development to ensure habitat is in a better state (by 10% gain) than it was before the development. This is a welcome requirement that will apply to all new development, including major infrastructure projects. If done well, it could ensure that habitats are improved across the country, including in urban areas and in new housing development. However, there are potential loopholes around the monitoring and enforcement of onsite net gain in particular, which could result in less improvement and creation of habitat in urban areas and in onsite in new developments.</p> <p>We also welcome the Green Infrastructure Framework, including standards. However, these are voluntary and are not likely to result in much change in new development.</p> <p>Finally, while there are references to biodiversity and nature-friendly design in planning policy and guidance, the Government could go further in mainstreaming nature-friendly design in all developments.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• Pledge £5.5 billion over 5 years to local authorities to level up urban green spaces and a longer-term programme of investment for green infrastructure.</li> <li>• Address implementation gaps in policy and guidance ahead of mandatory Biodiversity Net Gain in January 2024.</li> <li>• Achieving the Green Infrastructure standards should be mandatory in all new developments.</li> <li>• Mainstream nature-friendly design in all building developments, for example, through a requirement for all new developments to incorporate swift bricks.</li> </ul> |

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| <p><b>13. Access and benefit sharing</b></p> <p>Take effective legal, policy, administrative and capacity-building measures at all levels, as appropriate, to ensure the fair and equitable sharing of benefits that arise from the utilisation of genetic resources and from digital sequence information on genetic resources, as well as traditional knowledge associated with genetic resources, and facilitating appropriate access to genetic resources, and by 2030, facilitating a significant increase of the benefits shared, in accordance with applicable international access and benefit-sharing instruments.</p> |   |  |
| <p><b>14. Mainstreaming</b></p> <p>Ensure the full integration of biodiversity and its multiple values into policies, regulations, planning and development processes, poverty eradication strategies, strategic environmental assessments, environmental impact assessments and, as appropriate, national accounting, within and across all levels of government and across all sectors,</p>   |  | <p>Government published the Environmental Principles Policy Statement in February 2023, which set out environmental principles that should be “interpreted and proportionally applied” when making policy in England, to prevent environmental damage and improve our natural environment. The legal duty came into effect at the start of November 2023, so it remains to be seen how effective it is in influencing policymakers.</p> <p>Another policy that has been introduced as a result of the Environment Act 2021 is the updated biodiversity duty on public bodies. This policy calls for public bodies operating in England to ‘consider what they can do to conserve and enhance biodiversity’.</p> <p>With regard to environmental impact assessments, the Government is planning to reform Strategic Environmental Assessment (SEA) and Environmental Impact Assessment (EIA) which embeds environmental considerations into specific plans and project proposals. However, there is a great deal of</p> |

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| <p>in particular those with significant impacts on biodiversity, progressively aligning all relevant public and private activities, and fiscal and financial flows with the goals and targets of this framework.</p>  |   | <p>uncertainty about what these new Environmental Outcomes Reports (EORs) will look like and how they will operate.</p> <p>The Environmental Improvement Plan (EIP), published in early 2023, is the first revision of the 25 year environment plan. The cross-Government document sets out how to bring England’s natural world back to good health. Whilst this comprehensive approach is welcome, it lacks clear detail about how each government department will contribute to the delivery of this objective.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• EORs must not weaken any particular environmental protections, as well as the statutory requirement not to reduce the ‘overall level’ of environmental protection.</li> <li>• Further detail about how different Government departments will contribute to the delivery of the 2030 target to halt and reverse the decline of nature.</li> </ul>   |
| <p><b>15. Business</b></p> <p>Take legal, administrative or policy measures to encourage and enable business, and in particular to ensure that large and transnational companies and financial institutions:</p> <p>(a) Regularly monitor, assess, and transparently disclose their risks, dependencies and impacts on biodiversity, including with requirements for all large as well as transnational companies and financial institutions along their operations, supply and value chains, and portfolios;</p> |  | <p>The government supported the development of the Taskforce for Nature Related Financial Disclosures, which was launched in September 2023. The set of recommendations developed by the taskforce encourages businesses and financial institutions to report and act on evolving nature-related dependencies, impacts, risks and opportunities. Reporting under the TNFD is not mandatory in the UK, however, the government’s recent Green Finance Strategy notes that ‘the UK government will explore how best the final TNFD framework [...] should be incorporated into UK policy and legislative architecture, in line with Target 15 of the Global Biodiversity Framework’.</p> <p>Businesses and financial institutions are required to report on climate related risks and impacts, following the recommendations under the adjacent Taskforce for Climate related Financial Disclosures. To support companies develop ‘gold standard’ transition plans for this, HM Treasury established the Transition Plans Taskforce in 2022. These are both positive steps to ensure that businesses incorporate the environment into their decision making, however the climate reporting framework does not contain much on nature. Government should make reporting to the TNFD mandatory for large businesses and financial institutions, and incorporate nature into net zero transition plans.</p> <p>The Government has recently introduced a requirement for certain household goods to carry a water efficiency label to help consumers reduce their water use and save money on bills. Many food products already use eco-labels in the UK, however these are often from independent schemes. Government</p> |

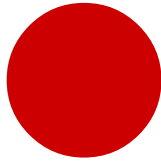
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| <p>(b) Provide information needed to consumers to promote sustainable consumption patterns;</p> <p>(c) Report on compliance with access and benefit-sharing regulations and measures, as applicable;</p> <p>in order to progressively reduce negative impacts on biodiversity, increase positive impacts, reduce biodiversity-related risks to business and financial institutions, and promote actions to ensure sustainable patterns of production.</p>  |   | <p>guidance on labelling here would provide much-needed consistency and transparency to better inform consumer choices and trust in the ratings presented.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• Make reporting to the TNFD mandatory for large companies and financial institutions</li> <li>• Require nature to be incorporated into net zero transition plans</li> <li>• Government should provide guidance on product labelling to improve consistency and transparency to better inform consumer choices.</li> </ul>   |
| <p><b>16. Consumption</b></p> <p>Ensure that people are encouraged and enabled to make sustainable consumption choices, including by establishing supportive policy, legislative or regulatory frameworks, improving education and access to relevant and accurate information and alternatives, and by 2030, reduce the global footprint of consumption in an equitable manner, including through halving global food waste, significantly reducing overconsumption and substantially reducing waste generation, in order for all people to</p> |  | <p>Roughly 75% of materials used to meet UK demands are sourced from overseas, with a general trend towards greater imports of materials. WWF-UK's <a href="#">global footprint report</a> showed that the UK needs to reduce its global footprint by three quarters by 2030 to meet planetary limits.</p> <p>The 25-year Environment Plan included a commitment to “leave a lighter footprint on the global environment” and for “our consumption and impact on natural capital being sustainable, at home and overseas”, but subsequent legislation, goals and targets have not reflected this promise. However, the Outcome Indicator Framework for the 25 YEP includes an experimental indicator to track the impacts on the environment globally resulting from UK domestic consumption, which is positive.</p> <p>The Environment Act 2021 also included a target to halve residual waste (excluding major mineral wastes) by the year 2042, measured as a reduction from 2019 levels. This contributes to an overarching aim for zero avoidable waste by 2050. Although this target is welcome, there is little detail about implementation and adequate policies in place to achieve it. The Government’s ambition would be further strengthened by establishing a resource consumption reduction target, alongside the residual waste reduction target, to incentivise a shift in the way society consumes and to drive innovation to increase resource efficiency across all industrial sectors.</p> |

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| <p>live well in harmony with Mother Earth.</p> |  | <p>Other relevant targets and commitments include the Net Zero strategy commitments for the near elimination of biodegradable municipal waste to landfill from 2028. The Resources and Waste Strategy included commitments to achieve a 65% municipal recycling rate and send less than 10% of municipal waste to landfill by 2035. Alongside these, the Government has made a commitment to eliminate avoidable plastic waste by 2042.</p> <p>In August 2023, the Government published its Waste Prevention Plan for England, focusing further up the waste hierarchy by setting out plans for how to prevent waste from occurring in the first instance. However, despite being released 4 years later than initially proposed, it lacks the necessary detail to fully address this challenge. Moreover, the last waste prevention plan was demonstrated to prevent less than 0.01% of England's waste, so there was a lot at stake for the new plan. This highlights a more general issue with the Government's approach to waste, which mostly focuses on recycling and waste management, rather than addressing the issue of waste generation. The focus should be squarely on reduction, enabling reuse systems and increasing affordable access to repair and refurbishment services across all product types.</p> <p>Progress on food waste reporting has been disappointing. A 2022 Government consultation on food waste reporting received support from 99% of respondents of the proposals to make reporting mandatory for large companies, including 79% of retailers and 73% of hospitality services. However, the latest waste prevention plan says that reporting will remain voluntary, despite the existing voluntary approach making little progress on minimising food waste.</p> <p>More positively, the Government's recent move to ban certain single use plastic items was welcome, as was the recent proposal to ban disposable vapes. The Government should expand the single use plastic ban to cover more items and the disposable vapes ban to include all vapes, including non-nicotine ones. The government's commitment to implement a Deposit Return Scheme is also positive, but it is disappointing that this will exclude glass items.</p> <p>With regards to supply chains and commodities, post Brexit trade deals are not adequately addressing sustainability standards. For example, the CPTPP has removed tariffs on palm oil imported from Malaysia without due regard to sustainability certification, despite there being an internationally recognised certification scheme under the Roundtable on Sustainable Palm Oil which includes a no more deforestation standard (thus preventing further destruction of tropical forest in SE Asia). This is taking us backwards in terms of improving sustainability in supply chains.</p> <p>Despite setting out the intention in the Environment Act 2021, the Government still hasn't brought forward secondary legislation on due diligence for deforestation-risk commodities, which is urgently</p> |
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|  |  | <p>required to tackle the impact of UK companies and consumers on global deforestation and land degradation through procurement of key agricultural commodities produced overseas. EU legislation on this is due to come into force at the end of 2024. The UK's commitment at COP28 to rid supply chains of products linked to illegal deforestation is positive, however it does not tackle legal deforestation (which is a bigger risk and covered in EU legislation). It also excludes rubber and coffee products, and the annual volume threshold of 500 tonnes could mean that damaging illegal deforestation is still allowed to continue.</p> <p><b>What is needed?</b></p> <ul style="list-style-type: none"> <li>• A target and plan for the reduction of resource consumption footprint</li> <li>• Setting and adhering to core standards in trade agreements, including certification schemes for sustainable production where their positive impact is recognised, such as RSPO certification for palm oil.</li> <li>• Government to bring forward secondary legislation on due diligence for deforestation risk commodities to tackle the impact of UK supply chains on global deforestation and land degradation.</li> <li>• Enabling circular economy behaviours in line with the waste hierarchy.</li> <li>• Implement vapes ban without delay and expand to non-nicotine vapes.</li> <li>• Make food waste reporting mandatory for large companies.</li> </ul> |
| <p><b>17. Biotechnology</b></p> <p>Establish, strengthen capacity for, and implement in all countries, biosafety measures as set out in Article 8(g) of the Convention on Biological Diversity and measures for the handling of biotechnology and distribution of its benefits as set out in Article 19 of the Convention.</p> |  | <p>In March 2023, the Genetic Technology (Precision Breeding) Act 2023 was passed, creating a new regulatory framework for the release, marketing and risk assessment of plants and animals produced through 'precision breeding', delivered through the editing of genes.</p> <p>There are concerns that this new framework is much less robust than current regulations around Genetically Modified Organisms, including plants and animals produced by inserting genes from different species. Precision breeding raises significant environmental and ethical concerns - and welfare concerns, in the case of animals. Even small changes to individual genes can have wide-ranging and unpredictable consequences for an animal or plant's entire genome. <a href="#">We recommend</a> that these potential benefits and risks be balanced by robust safeguards within the legislation, specifically covering animal welfare and ecological health.</p>   |

**18. Subsidies**

Identify by 2025, and eliminate, phase out or reform incentives, including subsidies, harmful for biodiversity, in a proportionate, just, fair, effective and equitable way, while substantially and progressively reducing them by at least \$500 billion per year by 2030, starting with the most harmful incentives, and scale up positive incentives for the conservation and sustainable use of biodiversity.



This rating has been informed by the following subsidy schemes:

**Farming subsidies:** In England, the Westminster Government has committed to moving away from direct payments and instead focus public money predominately on public goods. However, whilst Defra has started to reduce direct payments, the new ELM schemes are not fully operational. There is still a risk that scheme payments are designed to subsidise farm income, as opposed to driving environmental delivery. Defra must ensure that all ELM payments are compatible with the World Trade Organisation Agreement on Agriculture Green Box rules.

**Fishing subsidies:** The [UK seafood fund](#) is a £100 million programme of investment in UK fisheries, due to run from 2021 to 2025. This [one-off fund](#) to support fishing has five objectives, one of which is to support an 'environmentally sustainable fishing industry'. However, public information on how the fund has been spent to date is limited. This information should be published to enable an assessment of whether or not this new fishing incentive is harmful or negative to biodiversity.

**Biomass subsidies:** Bioenergy receives significant financial support from the UK government, despite concerns about the climate and biodiversity impact of bioenergy. For example, Drax - the EU's largest biomass power generator and UK's single largest CO2 emitter - earned £893m in subsidies in 2021. Due to an exemption based on bioenergy's supposed carbon neutral status, biomass power generators are not required to pay carbon taxes under the UK ETS. Subsidies should be redirected to genuinely renewable energy sources that do not damage nature.

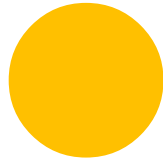
**Oil and gas:** In 2016, the UK Government committed to phasing out 'inefficient' fossil fuel subsidies by the end of 2025. However, in recent years the Government announced an increase in tax relief for investment in oil and gas production as part of a loophole to the Energy Profits Levy. The Government should halt the licensing and approval of new offshore oil and gas extraction in UK waters and remove any tax reliefs for oil and gas that incentivises a slower pace of transition to more renewable energy sources.

## 19. Finance

Substantially and progressively increase the level of financial resources from all sources, in an effective, timely and easily accessible manner, including domestic, international, public and private resources, in accordance with Article 20 of the Convention, to implement national biodiversity strategies and action plans, mobilising at least \$200 billion per year by 2030, including by:

(a) Increasing total biodiversity related international financial resources from developed countries, including official development assistance, and from countries that voluntarily assume obligations of developed country Parties, to developing countries, in particular the least developed countries and small island developing States, as well as countries with economies in transition, to at least \$20 billion per year by 2025, and to at least \$30 billion per year by 2030;

(b) Significantly increasing domestic resource mobilisation, facilitated by the preparation and implementation of national biodiversity finance plans or similar instruments according to national needs, priorities and circumstances;



To mobilise more private finance for nature, the UK Government needs to put in place an expectation that the financial and private sector will deliver a nature positive transition alongside the net zero transition. Supporting the TNFD as mentioned in target 15 is a good first step. However, the UK should provide further guidance on what this should look like, including in the form of nature positive pathways and a nature positive investment strategy, akin to the net zero pathways published by CCC and the Net Zero strategy. Companies must then incorporate nature into transition plans alongside climate targets to align with nature positive targets.

In June 2023, the UK Government committed to work with France to develop a global biodiversity credits roadmap with the aim of supporting private sector action on nature and mobilising more private finance towards preventing biodiversity loss and conserving nature. This is a positive step, but the partnership must ensure that high integrity credits are at the heart of any efforts to avoid enabling greenwashing. This includes strong requirements for buyers to demonstrate that they are taking actions to reduce their impact on nature before buying potential offset credits.


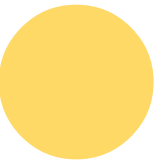
In Spring 2023, the Government published its Green Finance Strategy and Nature Markets Framework, looking at how private finance for nature can be scaled up whilst maintaining high integrity. This included details about a project with the BSI to develop standards for high integrity ecosystem markets. Further work is needed to ensure that there is robust governance in place to oversee nature markets in the UK, with further policy guidance on specific topics such as stacking credits.


In September 2023, the Government attempted to scrap the nutrient neutrality market, potentially allowing further pollution and damage to the country's waterways. Although the proposed changes were defeated, this move by the Government prompts concerns about its intentions and sincerity of its ambitions to protect nature and discourage those doing harm to nature from doing so.


The Government has announced several funds to support the protection and restoration of nature. For example, the Natural Environment Investment Readiness Fund is a £10m fund which provides grants up to £100,000 to support nature projects in England to the point where they are able to attract private investment. This operates alongside the £30m Big nature Impact Fund (BNIF), designed to support blended finance for nature-based projects and reduce risk for private investors. The Nature for Climate



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| <p>(c) Leveraging private finance, promoting blended finance, implementing strategies for raising new and additional resources, and encouraging the private sector to invest in biodiversity, including through impact funds and other instruments;</p> <p>(d) Stimulating innovative schemes such as payment for ecosystem services, green bonds, biodiversity offsets and credits, and benefit-sharing mechanisms, with environmental and social safeguards;</p> <p>(e) Optimising co-benefits and synergies of finance targeting the biodiversity and climate crises;</p> <p>(f) Enhancing the role of collective actions, including by indigenous peoples and local communities, Mother Earth centric actions and non-market-based approaches including community based natural resource management and civil society cooperation and solidarity aimed at the conservation of biodiversity;</p> <p>(g) Enhancing the effectiveness, efficiency and transparency of resource provision and use;</p> |  | <p>Fund, originally £640m and expanded to £750m, is dedicated to support nature-based projects that support progress on climate change mitigation and adaptation.</p> <p>For ESG regulations, there are some requirements for how funds are labelled under the Sustainability Disclosure Requirements (SDR) and investment labels regime. These should be improved to include more requirements for nature.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• Ensure that ecosystem markets are high integrity through government-backed, robust standards and strong governance of markets, including requirements for buyers to demonstrate that they are taking actions to reduce impacts on nature before purchasing credits.</li> <li>• Expansion and continuation of the Nature for Climate Fund.</li> <li>• Improve Sustainability Disclosure Requirements to include requirements for nature alongside climate.</li> </ul> |
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| <p><b>20. Capacity building</b></p> <p>Strengthen capacity-building and development, access to and transfer of technology, and promote development of and access to innovation and technical and scientific cooperation, including through South-South, North-South and triangular cooperation, to meet the needs for effective implementation, particularly in developing countries, fostering joint technology development and joint scientific research programmes for the conservation and sustainable use of biodiversity and strengthening scientific research and monitoring capacities, commensurate with the ambition of the goals and targets of the Framework.</p> |    |   |
| <p><b>21. Information</b></p> <p>Ensure that the best available data, information and knowledge are accessible to decision makers, practitioners and the public to guide effective and equitable governance, integrated and participatory management of biodiversity, and to strengthen communication,</p>  |  | <p>There is England-level support for a wide range of biodiversity monitoring programmes covering species and sites. These exist alongside outreach and communication material aimed at decision makers, practitioners and the public, including <a href="#">England-level indicators</a>, the <a href="#">State of Nature</a> report and the <a href="#">Outcome Indicator Framework</a>. There is work to be done to improve these existing datasets and to fill the gaps in environmental data, for example, especially in the marine environment.</p> <p>The Government has acknowledged the importance of good quality and available environmental data for good decision-making. There are several initiatives aimed at improving the state of environmental data in England, including the Natural Capital and Ecosystem Assessment (NCEA) and work to improve the accessibility of planning data.</p> |

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| <p>awareness-raising, education, monitoring, research and knowledge management and, also in this context, traditional knowledge, innovations, practices and technologies of indigenous peoples and local communities should only be accessed with their free, prior and informed consent, in accordance with national legislation.</p>  |  | <p>The Government has stated its intention, but not introduced any specific policies, to ensure that these databases and platforms are aligned to give decision-makers, developers, and local communities easier access to better data to inform choices.</p> <p>Any reform of environmental assessment must include a robust approach to providing and clearly communicating environmental information and engaging and taking into account local community information and perspectives.</p> <p><b>What is needed:</b></p> <ul style="list-style-type: none"> <li>• Improve existing datasets and to fill the gaps in environmental data, especially in the marine environment.</li> <li>• The Government should take more decisive action to ensure that datasets are aligned and readily available to decision-makers, developers, and local communities to inform better choices for the environment.</li> <li>• Data collected through environmental assessment evidence-gathering and monitoring should be shared and made available and usable for other purposes, to improve the existing environmental evidence base, which can then be mobilised for future environment assessments and inform best practice.</li> </ul> |
| <p><b>22. Indigenous People</b></p> <p>Ensure the full, equitable, inclusive, effective and gender-responsive representation and participation in decision-making, and access to justice and information related to biodiversity by indigenous peoples and local communities, respecting their cultures and their rights over lands, territories, resources, and traditional knowledge,</p> |  | <p>In England, the public sector equality duty requires public authorities to consider eliminating discrimination, including on the basis of race, including colour, nationality, ethnic or national origin, religion or belief, sex, and disability, when making decisions about how they provide services and implement policies.</p> <p>The UK is also required to comply with the Aarhus Convention, which sets out the right to access information, the right to public participation in decision-making, and the right to access to justice. However, the government has adopted legislative changes since 2015 that the Aarhus Convention Compliance Committee has concluded render the UK not only in breach of its international obligations but moving further away from compliance.</p>  |

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| <p>as well as by women and girls, children and youth, and persons with disabilities and ensure the full protection of environmental human rights defenders.</p>  |   | <p>There are no policies or provisions relating specifically to the full, equitable, inclusive, effective and gender-responsive representation and participation in decision-making, and access to justice and information related to biodiversity by indigenous peoples.</p>   |
| <p><b>23. Gender</b></p> <p>Ensure gender equality in the implementation of the Framework through a gender-responsive approach, where all women and girls have equal opportunity and capacity to contribute to the three objectives of the Convention, including by recognizing their equal rights and access to land and natural resources and their full, equitable, meaningful and informed participation and leadership at all levels of action, engagement, policy and decision-making related to biodiversity.</p> |  | <p>In England, the public sector equality duty requires public authorities to consider eliminating discrimination, including on the basis of race, including colour, nationality, ethnic or national origin, religion or belief, sex, and disability, when making decisions about how they provide services and implement policies.</p> |

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## For more information

For questions or further information please contact: Imogen Cripps, Wildlife and Countryside Link, E: [imogen@wcl.org.uk](mailto:imogen@wcl.org.uk)

## About Wildlife and Countryside Link

Wildlife and Countryside Link is the largest environment and wildlife coalition in England, bringing together 80 organisations to use their strong joint voice for the protection of nature. Our members campaign to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

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