

Environmental Targets briefing from Wildlife and Countryside Link & Greener UK

The Environmental Targets (Biodiversity) (England) Regulations 2022

Summary

- With the exception of the 2030 species abundance target, the targets overall are lacking in ambition and fail to measure up to the commitments made by the UK government in the Kunming-Montreal Global Biodiversity Framework
- A legally binding target for the condition of terrestrial protected areas should be set under the Environment Act powers as a matter of urgency to ensure that these sites are able to drive nature's recovery.

The ingredients of a successful biodiversity targets package

First it must ensure **high ambition** – the targets must be stretching in order to drive a step change in government action to turn around the fortunes of England's wildlife. These targets will crystallise the long term objectives for wildlife at a time when we are living in one of the world's most nature depleted countries and languishing at the bottom of the league table among G7 countries, as measured by the [Biodiversity Intactness Index](#).

At December's conference of the Parties to the Convention on Biological Diversity, the UK government agreed to a new "[Kunming-Montreal Global Biodiversity Framework](#)" which is intended to address the dangerous loss of biodiversity and restore natural ecosystems. The Environment Act targets are a test of the Government's genuine commitment to its new international commitments, as it is they that will drive action for nature's recovery on the ground domestically.

Second, it must be **comprehensive**. There is no pre-existing legal targets framework for this element of our natural environment, in contrast with water and air, so there is much heavy lifting for these targets to do. A comprehensive set must address both species and the habitats on which they rely. For species, an abundance target should cover as wide a range of organisms as possible to capture a representative picture of the diversity present within England's terrestrial, freshwater and marine habitats. A corresponding target for extinction risk is also required as a broad abundance indicator could overlook the plight of those rarer and more specialised species. In the case of habitats, targets for extent and condition of habitats, both within and beyond the boundaries of protected sites, are needed.

The draft Biodiversity SI contains a serious omission – and therefore fails to be comprehensive in its coverage – as there is no target for the condition of terrestrial protected sites (Sites of Special Scientific Interest or SSSIs).

Effective protected areas are proven to be successful for safeguarding nature and will be vital for reversing declines in species abundance. Defra recognised in its [consultation response](#) on targets that "to halt nature's decline by 2030...we will need to take action to restore our protected sites, which are vital wildlife havens". At Geltsdale in Cumbria, for example, improvement in SSSI condition has increased the abundance of a diverse range of bird species, including Black Grouse, Whinchat and Grasshopper Warbler, while sphagnum mosses and plants such as Lesser Twayblade, Bog Asphodel and Cranberry have also responded well.

Protected areas are the front line of defence against growing pressures from human activity and climate change and are vital for securing the future of some of our most important species and habitats, particularly when integrated into wider landscapes and seascapes that are also well managed for nature. They are also the final refuges of some of our most vulnerable species, vital to driving nature's recovery across the wider landscape.

The commitment in the 25 Year Environment Plan for 75% of SSSIs to be in favourable condition has [failed to drive improvement](#). Instead, the percentage in favourable condition in England has remained steadfastly below 40%. A legally binding target is needed to ensure that these important areas can become the havens for wildlife that they are meant to be.

The Secondary Legislation Scrutiny Committee's [report](#) (page 5) on Environment Act targets highlights our concerns about the absence of a favourable condition target and provides the Government's response on this point. The response does not set out why the Government feels that such a target is not possible and simply restates a commitment to the 25 Year Environment Plan goal. As set out the Office for Environmental Protection's recent [report on progress](#) (page 9) with the 25 Year Environment Plan, these goals are not being delivered, the report calls for "*challenging apex targets for all EIP goals*".

The UK's agreement to the Convention on Biological Diversity post-2020 framework, further strengthens the case for a protected sites target. The new framework includes targets to "ensure that by 2030 at least 30% of areas of degraded terrestrial, inland water, and coastal and marine ecosystems are under effective restoration" and that by 2030 at least 30% of the land and sea is protected and effectively managed for nature. Currently only 3% of land is both protected and effectively managed for nature – a binding target is needed to drive the effective management and recovery of our existing protected sites, both to contribute towards that 30% target and to support achievement of the species targets.

Comments on specific targets within the Statutory Instrument

Species' extinction risk target (Part 2, Regulations 4-6)

The long-term biodiversity target for species' extinction risk is to reduce the risk of species' extinction by 2042, when compared to the risk of species' extinction in 2022.

England's Red List Index contains 8259 species all of which have been [assessed](#) for GB extinction risk and assigned to a representative category. Categories in order of increasing extinction risk: Least Concern; Near Threatened; Vulnerable; Endangered; Critically Endangered; Extinct in the Wild; Extinct.

These categories equate to scores, and the scores of all species are combined to give a single figure (a threat score) representing overall extinction risk for all species. Defra's target could technically be met if a single species moved one step from a higher to a lower risk category, with other species retaining their present status. For example, by moving a species such as Turtle dove from Critically Endangered to Endangered or High brown fritillary from Endangered to Vulnerable, would be sufficient as there is no requirement for a statistically significant increase in the indicator value. With the 2019 State of Nature report finding that 13% of species in England were classified as threatened with extinction from Great Britain, greater ambition is needed in the target.

In contrast, Goal A of the [Kunming-Montreal Global Goals for 2050](#) envisages that “by 2050, extinction rate and risk of all species are reduced tenfold”. Reducing extinction risk tenfold (here taken as a tenfold decrease in the threat score) requires 3,457 step changes of species moving to the next lowest risk category (with the status of some species improving by several categories). This would require at least three quarters of the species that are currently threatened with some level of extinction to reach “Least Concern” status, at which they are no longer considered at risk of extinction. The minimum level of ambition required by Defra’s target would not put England on track to meeting the Montreal target 8 years later.

Wildlife-rich habitat restoration or creation target (Part 3, Regulations 7-10)

The long-term biodiversity target for the restoration or creation of wildlife-rich habitat is that on or after the day these Regulations come into force, in excess of 500,000 hectares of a range of wildlife-rich habitats are to be restored or created by 31 December 2042.

The target for the restoration or creation of wildlife-rich habitat has been set below the 750,000ha level that was supported by a large majority of experts and the public consulted during the target development phase. This lower ambition is further eroded by the use of a gross figure, which does not account for habitat losses, opening the possibility that overall extent of priority habitat could continue to decline. A habitat metric for the “quantity, quality and connectivity of habitats” that would make a suitable measure of habitat outcomes is included in the Outcome Indicator Framework which tracks progress in delivering the 25 Year Environment Plan but remains in the development phase, despite having just passed the five year anniversary of the plan’s publication. Defra’s [aim](#) is for the indicator to be finalised in 2024 and it should commit to using this as a metric to set a net target for habitats as soon as it becomes available.

Regulation 8 suggests that compliance with the habitat creation target will depend on whether action ‘is being taken’. Previously, Natural England has counted all SSSI units with a management plan in place as ‘recovering’, regardless of whether the plan was funded, being implemented or even likely to result in recovery. This led to some misclassification of sites as recovering, where no real action had taken place. There should be clarity from Defra about the steps it will put in place to ensure that only those areas where habitat creation/restoration is actually underway and proving effective are counted.

2030 species abundance target (Part 4, Chapter 1, Regulations 11-13)

*(1) The 2030 species abundance target is that the overall relative species abundance index on the specified date indicates that the decline in the abundance of species has been halted.
(2) The specified date for the 2030 species abundance target described in paragraph (1) is 31 December 2030.*

The government has set itself a stretching 2030 target to halt declines in species abundance given the relatively short timeframe and for many species, a time lag in terms of ecological response to conservation action. The target needs to catalyse the swift roll out of a suite of ambitious policies that tackle the pressures on biodiversity and drive habitat improvements to ensure species can thrive. A refreshed Environmental Improvement Plan must set out clearly the steps to achieve this, including how the new Environmental Land Management schemes will contribute to meeting the targets and how improving the condition of protected sites is to be achieved.

Additional species have been added to the indicator for the abundance targets, but the representation of marine species remains poor, and we favour the addition of species to the indicator over time to make it more representative of England's biodiversity.

Long-term biodiversity target to reverse the decline of species abundance (Part 4, Chapter 1, Regulations 14-16)

The long-term biodiversity target to reverse the decline of species abundance is that the overall relative species abundance index by 31 December 2042 is—
(a) higher than the overall relative species abundance index for 31 December 2022; and
(b) at least 10% higher than the overall relative species abundance index for 31 December 2030 (the specified date for the 2030 species abundance target)

Although there is now a certain baseline in the form of a 2022 base year, ambition for the long term species abundance target remains weak. The long-term target will be met if the 2042 value is above the 2022 value but there is no consideration that the increase should be statistically significant, so the 2042 value could be greater than the 2022 value by an infinitesimally small amount and the target would be met.

Given that current levels of species abundance in England are depleted compared with historic levels (41% of species have decreased in abundance since 1970) it is disappointing that such an unambitious long term target has been set. It also falls far short of Goal A of the [Kunming-Montreal Global Goals for 2050](#) which states “abundance of native wild species is increased to healthy and resilient levels” by 2050.

Defra's target to “ensure that species abundance in 2042 is greater than in 2022, and at least 10% greater than 2030” could be met by restoring 1% of the moth, 3% of the butterfly and 5% of the bird abundance that has been lost since 1970 (analysis based on population trends in Defra's indicator for priority species as wider species abundance data is not yet available). There is no firm definition of what “healthy” or “resilient” is in this context, but we might foresee it meaning more than these minor population recoveries.

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