Wildlife and Countryside Link response to Government Consultation on Indicators

Wildlife and Countryside Link (Link) brings together over 30 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and marine environment and biodiversity. Taken together our members have the support of over 8 million people in the UK and manage over 690,000 hectares of land.

This response is supported by the following 12 organisations;

- Badger Trust
- Bat Conservation Trust
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation
- The Grasslands Trust
- The Mammal Society
- People's Trust for Endangered Species
- Plantlife
- Royal Society for the Protection of Birds
- Wildfowl & Wetlands Trust
- The Wildlife Trusts
- Woodland Trust

Question 1

Ensuring development options have been adequately identified. **For those indicators topics assessed as amber or red in Table 2, are there any:**

a) **Existing indicators (under development or used elsewhere), or**
b) **Existing data sources**

that are not listed in the discussion document but which could be used to develop indicators for the Strategy?

1. *Extent and condition of selected habitats*. We agree with the 'red' assessment. This topic area should refer to all priority habitats (s41 of NERC Act 2006) and not just selected ones. We note that there is not a comprehensive data set (baseline) on extent or condition for most habitats but there is an urgent need for this to be developed using, for example, GIS technology to measure the extent of habitats and ground truthing to assess their condition. This indicator is a high priority for development. The development options given in the discussion document will not, in our view, deliver an effective indicator.

4. ***Status of priority species***. We agree with the 'red' assessment. We believe there is data and valuable qualitative information held by individuals and organisations but there is no current way of easily accessing this, following the neglect and demise of the BAP Lead Partner network. This gap needs to be filled to ensure adequate reporting as well as action. This is an urgent development need, and should include a realistic approach to the resources required to gather valuable information from voluntary societies and schemes. In addition, the Rothamsted Insect Survey and the Water Framework Directive are existing data sources that should be better utilised.

8. ***Awareness, understanding and support;*** and

9. ***Taking personal action for biodiversity***. We believe there is potential overlap between these two indicators and consideration could be given to combining them. Increasing awareness, understanding and support is the precursor to taking action. We do not agree with the 'green' assessment. Taking personal action is important and, as the Aichi target recognises, there are several steps people can take to conserve biodiversity sustainably. Volunteering is an important step but there are others such as giving and campaigning. Consideration should be given to incorporating one of these aspects of taking action into this indicator. For example, the number of responses from the general public to Government consultations on the natural environment or to the number of biodiversity related responses to local planning applications (see also below) could be considered.

11. ***Integrating biodiversity into local decision making***. We disagree with the 'green' assessment for this indicator. We believe this should be 'red'. It is very important that local authorities collect data on the positive management of Local Wildlife Sites and believe this should be continued, but this is more relevant to indicator topics 1 and 2 than integrating biodiversity values into local development (Aichi target 2). We believe that development of an indicator based on changes of land use as a result of planning applications and/or the way that biodiversity has been addressed within planning applications should be considered. Collection and analysis of this data will be of benefit to local authorities and local communities as well as providing an important indicator of integration and, potentially, habitat change.

13. ***Sustainable consumption***. Reference is made to UK trade statistics (but the web link given in the consultation did not work) but clarity is needed over which issues will be considered and how. For example, consideration should be given to monitoring the imports of tropical timber and timber from temperate sources that is not harvested sustainably.

Question 2

***Identifying preferred options*. Indicators should be:**

   a) **Relevant to the strategy**
   b) **Easily communicated to a non-specialist audience**

c) **Based on suitable high quality data sets, (e.g. with a time series > 5 years, of known precision, with representative geographic coverage, regularly updated, and with a published methodology.**

In addition, the indicator set should be compact and comprehensive and not place substantial financial burdens on the public sector.

Which of the options set out in the discussion document, or that you have identified in Q1 above, best meet these requirements?

1.   *Extent and condition of selected habitats.* None of the data sources set out in the document are adequate. Focusing too heavily on SSSI data would be inappropriate; SSSI status is picked up elsewhere in the indicator set. BARS is out of date and incomplete over large swathes of the country and identifying a species proxy would very difficult (and should not be based just on availability of data). This is a key indicator area and one in need of significant development. Habitat inventories, such as that for woodland, are better at assessing extent than condition but still fall well short of what is needed. For specific EBS outcomes, such as the 200,000 ha increase in extent of priority habitat there is a clear need for a bespoke GIS based system to record progress.

2.   *Extent and condition of protected sites*. It will be important to maintain or improve condition monitoring including on non-SSSI sites, for example, Local Wildlife Sites, if we are to provide reliable assessment of progress towards EBS outcome 1A. Incorporating data on new marine designations will also be a priority for the development of this indicator.

4.   *Status of priority species*. We favour the development of a new indicator based on changes for a representative sample of species using both qualitative and quantitative monitoring information. However, great care will be needed to ensure that any sample is truly representative of the full range of taxa and the set of species selected do not become the sole focus for targeted action. We do not believe that information from protected sites, the NBN gateway or BARS will provide a robust or appropriate indicator. However, if the SSSI notification strategy significantly improves the identification of which s41 species are present on SSSIs and site monitoring is expanded to monitor these accordingly SSSI data may be useful in the future.

8.   *Awareness, understanding and support.* We favour refining the Defra Public Survey of Attitudes and Behaviours towards the Environment to seek more information on public attitudes to biodiversity. At present this indicator is based on attitudes to wildlife gardening which is as much about taking personal action (indicator 9) as support and awareness. This survey should focus on whether people are a) concerned by habitat loss and species declines b) keen to know what they can do to help and c) supportive of local and national government taking action. The public's perception of what constitutes a rich or poor wildlife site may be at odds with the actual biodiversity value of those sites; this could be investigated.

9.   *Taking personal action*. We recommend that consideration is given to collecting information on the number of people involved in volunteering as well as the total number of

volunteer hours. Information on volunteer hours is collected from NGOs through the Environmental Volunteering Network (EVN). But not all organisations are consistently approached and data is therefore fragmented.

15. ***Trends in pressures***. For invasive non-native species there is reference to changing from an indicator that considers changes in extent of existing INNS to looking at the success of measures to prevent the establishment of new INNS. We recommend looking at both. The effectiveness and progress with measures to reduce and eradicate INNS is too important to remove from this indicator. We note that development pressure and land use change has not been included under this indicator. This has potential to be an increasing pressure on biodiversity and should not be ignored (see comments on indicator 11 under question 1).

16. ***Integration of biodiversity into key production sectors.*** Area of farmland in agri-environment schemes is given as one of the existing indicators. We need a smarter indicator than just areas within schemes. Better monitoring of AES schemes is needed – HLS should be delivering for priority species, habitats and ecosystems and the results of this work needs to be captured. The current approach is inadequate.

Question 3

Do you have any other comments on the proposed set of indicator topics or development options?

Coverage of targets//outcomes. We agree with the need to define a manageable list of biodiversity indicators. However, we are concerned that in the attempt to 'tick off' as many of the EBS outcomes and Aichi targets as possible the consultation paper has been over-optimistic in its assessment of the suitability and coverage of the proposed indicators. For example, the indicator on habitat connectivity (3) is unlikely to provide useful reporting against EBS outcome 1 or Aichi targets 5 and 11. Other indicators (1 on habitats and 2 on sites) are likely to be more appropriate.

Status assessments. We also believe that that assessment of status of the indicators is too positive in several cases. We believe that it would be wrong to gloss over the extent of the development work that is required to ensure the indicators are fully fit for purpose. We set out in the annex below the indicators where we query the current assessment and give the reasons for this in each case.

Priorities for development. We fully recognise that there currently may be limited resources for the development of these indicators. We believe we should be explicit about what needs to be done to develop these indicators but also clear that some are higher priority than others. Indeed, there are some that we believe that could be dropped from the indicator set at this stage.

Highest priority for development –

1 Extent and condition of priority habitats

4 Status of priority species

5 Trends in abundance and distribution of selected species

11 Integrating biodiversity considerations into local decision making

15 Trends in pressures

16 Integration into key production sectors

Indicators that could be dropped or development put on hold;

3 Habitat connectivity – covering more habitats and assessing extent and quality should be addressed by indicator 1. This is the priority for development.

6 Status of habitats and species providing essential ecosystem services (but a specific indicator on fish stocks should be retained)

10 Valuation and accounting for biodiversity

Overlap. There is currently significant overlap between some of these indicators or potential reliance on the same data. For example, there is overlap between indicator 8 (awareness, understanding and support) which is currently focussed on wildlife gardening which is an example of taking personal action for biodiversity (9).

Reliance on inadequate data systems. Several of the potential data sources quoted in the consultation are either not up to the task or will need renewed commitment or development if they are to be of use in the future. For example, there are several references to BARS and the NBN but the data on these systems are far from complete. BARS is largely focussed on actions rather than outcomes and there must be serious doubts over the amount of data that will be added to this system in the next few years. Under indicator 1 it is stated that data on habitat loss and gain entered by local biodiversity partnerships to BARS is a potential data source. We suspect that the level of information added to this system to date is limited and patchy. With the reduction in funding for LBAP partnerships and the demise of specific national targets for species and habitats we fear that this is unlikely to be reversed without clear and concerted action.

Need for specific data recording systems. We believe that the restoration outcomes of the EBS, the 200,000 ha increase in priority habitats and the restoration of 15% of damaged ecosystems will require dedicated systems and a concerted effort from Natural England and its partners if we are to properly report on progress.

Clarity over gaps in indicators. The consultation lacks clarity in places over the gaps in indicator delivery. For example, under indicator 4 on priority species, it states that significant development is needed **if** reporting round data are no longer available (our emphasis). It is

clear that reporting round data are no longer available, there was no 2011 reporting round and no indication from defra that there will be another reporting round in the future. Many species added to the BAP list in the review concluded in 2007 have not been reported on, as reporting rounds focussed on the original BAP listing. This leaves a large, glaring gap in reporting and the indicators.

Smarter surveillance. One key message that we believe comes out of the development of these indicators is that we need smarter surveillance of biodiversity that utilises both modern technology such as GIS, remote sensing and even social media but also captures the wealth of information and knowledge that is held by people involved in biodiversity delivery.

Annex – Summary of indicators where we disagree with the assessment of status given in the consultation and the reasons for this.

2. ***Extent and condition of protected sites***. This is given as Green. We would suggest that to incorporate new marine sites and to actually reflect condition rather than management status this could be amber.

3. ***Habitat connectivity***. This should be red and not amber. The indicator is not relevant/available for a range of priority habitats e.g. heathlands. It is difficult to understand or communicate - connectivity is not simply about extent of habitat but also habitat quality and importantly processes within the landscape necessary to facilitate dynamism within species populations. Some of the data sources are infrequent (countryside survey) or substantially incomplete (BARS). The main development options appear to be to develop a new indicator!! A connectivity measure can be gleaned from indicator 1 if habitat extent and condition and measured correctly.

5. ***Trends in abundance and distribution of selected species***. This is given as green and we would agree with this assessment for the existing use of birds, bats, butterflies and plants. However, we agree with the desirability of expanding this to include other taxa and therefore suggest that this could make this amber.

8. ***Awareness, understanding and support***. This is given as green but we believe that rather than focus on wildlife gardening this should be about support for species and habitat conservation (see response to question 2 above). Wildlife gardening is a very important example of people taking action for wildlife (and may be more relevant to 9 below). It is an important entry point for many people but it is also the focus of a specific scheme that was launched alongside the EBS. Therefore it may not be a particularly reliable, independent indicator of awareness, understanding and support overall.

9. ***Taking personal action.*** We believe that whilst volunteering is vitally important, it is only one aspect of taking action for nature. This indicator is therefore too narrow and we believe that consideration should be given to expanding it to cover other forms of action such as responding to consultations and or planning applications or membership of wildlife conservation

organisations. This would require indicator development and this assessment should therefore be amber and not green.

11. ***Integrating biodiversity considerations into local decision making***. Although the current indicator could play an important part in providing information on the condition of sites and habitats (1 and 2) we do not believe it is truly appropriate for this indicator topic and in particular is not effective in reporting against Aichi target 2. This should be reporting on a suite of activities that local authorities are doing to address their biodiversity duty under section 40 of the NERC Act 2006. This would need development and should therefore be red and not green.

Wildlife and Countryside Link
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