

Wildlife and Countryside Link's response to Natural England's draft policy on the Ecosystems Approach

July 2009

Wildlife and Countryside Link (Link) brings together voluntary organisations in the UK concerned with the conservation, enjoyment and protection of wildlife, countryside and the marine environment. Our members practice and advocate environmentally sensitive land management and food production practices and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together our members have the support of over 8.3 million people in the UK and manage over 690,000 hectares of land, including woodland.

This statement is supported by the following 12 organisations:

- Badger Trust
- Bat Conservation Trust
- Buglife – The Invertebrate Conservation Trust
- Friends of the Earth England
- Froglife
- Herpetological Conservation Trust
- The Grasslands Trust
- The Mammal Society
- Plantlife International
- Ramblers
- Wildfowl & Wetlands Trust
- The Wildlife Trusts

General comments

Link welcomes Natural England's decision to produce a policy on the ecosystems approach but we are concerned that the current draft policy has been produced at a time when our collective understanding of the ecosystem approach and the availability of quantifying research evidence is still emerging. We believe the development of this policy would benefit from further discussion with a range of external organisations and in consultation with the other Government bodies who are essential to the delivery of an ecosystem approach.

It is our opinion that the policy correctly states the need for the ecosystem approach to be applied appropriately within policy and decision making yet there seems to be some confusion as to whether this policy purports to 'ecosystem service delivery', 'an ecosystem services approach' or 'the ecosystem approach'. The proposed name of the policy '*The True Value of Nature*' misinterprets our understanding of the basic principle of the ecosystem approach, that of an integrated management framework. This flaw plays down the significance of the ecosystem approach and we are concerned that this will lead to confusion amongst Natural England staff and the wide community it wishes to influence.

If this paper is, as titled, about the ecosystem approach (rather than an 'ecosystem services approach' an undefined term that has been used in a number of different contexts) then there has already been considerable work invested in developing policy regarding how this is defined and delivered, which this paper fails to either adhere to or incorporate.

While Link supports the four elements for policy statements highlighted in the draft policy;

- ecosystems services considered in decision making,
- public understanding,
- society engagement, and
- innovative support mechanisms

We would urge caution in the assumption that the sum of these elements is sufficient to fully understand the ecosystem approach. Furthermore, whilst case studies and research relating to the ecosystem approach are briefly mentioned, these are difficult to understand without the inclusion of details or references.

We are also concerned that this policy falls short of the detail required to explain how Government should implement the ecosystems approach. Link believes that the final policy document should detail the direction of change necessary towards an ideal outcome and suggest that action and intent to influence be embedded from the start. The lack of a clear policy context in which an ecosystems approach is proposed is a weakness of the draft document. However much Link may support the principles of this approach, without a strong indication of how an ecosystems approach will be secured and how government, business and society are required to support it, it is likely to have a peripheral effect on the actual condition of our natural environment and human well-being.

Ecosystem Approach description

The Convention of Biological Diversity (CBD) defines an ecosystem as "a dynamic complex of plant, animal and micro-organism communities and their non-living environment interacting as a functional unit". There are many ecosystems that exist at small scales which are not associated with areas of land or water.

The predominate focus on ecosystems services in this paper is a considerable deviation from the CBD definition which is "the ecosystem approach is a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way. Thus, the application of the ecosystem approach will help to reach a balance of the three objectives of the Convention: conservation, sustainable use, and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources."¹

This definition has been also used in 'Conserving biodiversity - the UK approach', 2007² and 'Our Seas - a shared resource: High level Marine Objectives', 2009³, and this policy paper seems to integrate only two of the three objectives of the

¹ COP Decision V/6.

² See <http://www.defra.gov.uk/wildlife-countryside/pdf/biodiversity/conbiouk-102007.pdf> published by UK Government, Welsh Assembly Government, Northern Ireland Executive and Scottish Executive

³ See <http://www.defra.gov.uk/marine/pdf/environment/ourseas-2009update.pdf> published by UK Government, Welsh Assembly Government, Northern Ireland Executive and Scottish Government

Convention. We believe that a proper ecosystem approach needs to do more than just recognise the importance of the intrinsic value of biodiversity; it should incorporate this value and ensure that biodiversity is conserved. The definition of the ecosystems approach within Natural England's policy should be made compliant with the CBD.

Policy 1: Ecosystem services integral to decisions

We agree that the conservation of ecosystem service functionality is an important element of the ecosystem approach. However, it would be inaccurate to limit the description and understanding of this complex paradigm to a single element.

In relation to the delivery of ecosystem services, Link supports the headline policy statement. We agree that "decisions about the natural environment should seek to maintain the provision of ecosystem services", however, the policy should reflect the ambition to "enhance" rather than to solely "maintain" an existing resource. We have already lost considerable ecosystem service capacity, as highlighted by the continuing decline of biodiversity. The draft policy adds that Natural England will over time develop its knowledge base to improve decision making and advice. We believe this should be an overarching operational principle of Natural England and not limited to this policy alone. It is also essential to recognise that the ability to achieve this level of knowledge is outside the capacity of any one organisation and as an ecosystem approach would indicate this effort will need to be adopted by research councils and other Government agencies.

The draft policy seeks to maintain ecosystem services compatible with respect for the intrinsic value of the natural environment. The statement "although we are increasingly able to state the costs of natural environment protection we have no systematic way of representing the associated benefits" does not lend support to this premise. Referring only to a need to provide a monetary valuation of the natural environment serves to weaken its intrinsic value and does not adequately provide a robust argument for the added benefits of a true economic valuation.

The scope of benefits from the natural environment include biological, ecological, social, economic, cultural and political. We are disappointed that the evidence presented in this section is limited and wish to see more examples in the final policy.

Policy 2: better public understanding

The draft document states "The value of the natural environment is not adequately recognised by society and it is crucial that people understand the links between their own well-being and the value of services provided by the natural environment." Link strongly endorses this aspiration, but without defined obligations, limits and specific policy objectives, the risk is that pursuit of this laudable statement will be left to the good will of individuals and some voluntary non-governmental organisations.

Wider public understanding of the importance of the natural environment and biodiversity is essential and we support Natural England's aim of taking responsibility to communicate on society's interdependency. However, we suggest the headline policy statement should be more strongly worded to reflect the urgency of this matter. Also, not only is it crucial that people understand the links between their own wellbeing and the valuable services provided by the natural environment, but that

they can act accordingly. To achieve this will mean considerable greater empowerment of the consumer to make sustainable environmental decisions.

The public's current understanding of the value biodiversity as a measure of ecosystems can be demonstrated by Link's members. Link's 38 members collectively employ 9600 full-time staff, have the help of 170,000 volunteers and the membership support of over 8 million people in the UK. It can be argued that these 8 million people provide one measure of the percentage of the population who already value the natural environment.

To reach more people we would like to see a policy that seeks to help the public understand biodiversity in a way that empowers them to engage in decision making and which does not undermine the intrinsic and aesthetic values of nature. This may involve a better engagement with the national curriculum and a program of awareness-raising as to the benefits of a healthy environment, which need not be monetarised.

Specifically in relation to the Aberystwyth University research, Link's engagement with this project came to an end in the spring of 2008. As key deliverers of the Biodiversity Action Plan we were actively engaged in the initial phases but are concerned that we will be unable to support the outcomes unless our engagement is reinstated at the earliest opportunity.

Policy 3: society engaged

This headline policy statement is closer to our shared understanding of a key aspect of the ecosystem approach - that all sectors of society have a role to play. We suggest that more appropriate wording would be "action is necessary from all sectors of society....to support and enhance the conservation of valued ecosystems and their sustainable use" rather than just the provision of ecosystem services.

The role of Government and public bodies appears to be confined to land owning and therefore direct provision of ecosystem services, which should be an ecosystem approach to land management. Government also plays a vital role in setting economic and other policy which has a bearing on the natural environment, and in regulating activities and enforcing policies across protected sites, the wider countryside and urban areas, for example through the planning system. Reference to the local authority commitment to taking action to conserve biodiversity and the natural environment through the provision of the Biodiversity Duty and PSAs including 7 and 28 should be included and explored in the revised policy.

Policy 4: innovative support mechanisms

This policy statement is ill-defined, lacks clear evidence and lacks a forward process. Many existing mechanisms would benefit from better monitoring and an increase in and better targeting of funds. We are concerned that a reliance on the market will benefit only a small suite of ecosystem services with many species and habitats falling out of this framework due to their non-provision of services and the inherent difficulty of demonstrating their intrinsic value.

Furthermore, in light of climate change there is an imperative to restore natural processes. This requires a change in policy and removal of blockages rather than

innovation. Working under the premise that naturally functioning habitats deliver a more sustainable suite of services, these innovative support mechanisms will need to recognise the relationship between different services, as well as the local and national impacts of favouring the enhancement of one ecosystem service over another.

Policy 5: investment in ecosystems

Link agrees that more investment is needed in the sustainable management of the natural environment, and we would urge its enhancement rather than solely its delivery. We would hope to see an overall enhancement in a way that supports Natural England's objectives of a healthy robust environment. We support the notion from the evidence section that the state of biodiversity (species and habitats) provides a direct indication of the health of the natural environment and therefore ecosystem service provision. Indeed, this relationship should be strengthened within the policy document as an additional value of biodiversity, beyond intrinsic or monetary values. Aside from the need for more investment, guidance on how to plan and carry out good ecosystem restoration work will also be required.

Some of the wording in this section would benefit from some close analysis. We question whether it is meaningful to say that "England's store of natural capital is largely in the form of ecosystems", without defining what the other natural capital is. We are also unsure what is intended by saying that ecosystem quality will be 'measured by their ability to sustainably deliver ecosystem services and maintain their intrinsic value', it is not clear what an intrinsic ecosystem value is, should this instead say 'and support threatened species'.

In response to Defra work on the National Ecosystems Assessment, Wildlife and Countryside Link and Wales Environment Link welcomed the proposal made by the Rt Hon. Hilary Benn MP, Secretary of State for the Environment, in December 2008 for the preparation and commitment of £500,000 for an Ecosystem Assessment for England. Our full joint response to the announcement is enclosed for your information under Annex B.

We support the principle that the proposed assessment follows the approach taken in the Millennium Ecosystem Assessment 2005 and welcomed Defra's work in developing their ecosystem approach. In developing the analysis of a National Ecosystem Assessment, we are keen to see Defra make wise use of the wealth of data and studies that describe the provision of ecosystem services from the UK landscape. We would also urge the Department to make any outputs easy to communicate and would like the project to remain transparent throughout its development, and to provide timely updates. A final report that could be readily understood by the 'interested public' would help all of us to raise the profile of the services that we all gain from the natural environment.

Wildlife and Countryside Link
July 2009

Annex A: CBD definition and principles

“The ecosystem approach is a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way. Thus, the application of the ecosystem approach will help to reach a balance of the three objectives of the Convention: conservation; sustainable use; and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources.” COP Decision V/6.

Principle 1: The objectives of management of land, water and living resources are a matter of societal choices.

Principle 2: Management should be decentralised to the lowest appropriate level.

Principle 3: Ecosystem managers should consider the effects (actual or potential) of their activities on adjacent and other ecosystems.

Principle 4: Recognising potential gains from management, there is usually a need to understand and manage the ecosystem in an economic context.

Principle 5: Conservation of ecosystem structure and functioning, in order to maintain ecosystem services, should be a priority target of the ecosystem approach.

Principle 6: Ecosystem must be managed within the limits of their functioning.

Principle 7: The ecosystem approach should be undertaken at the appropriate spatial and temporal scales.

Principle 8: Recognising the varying temporal scales and lag-effects that characterise ecosystem processes, objectives for ecosystem management should be set for the long term.

Principle 9: Management must recognise the change is inevitable.

Principle 10: The ecosystem approach should seek the appropriate balance between, and integration of, conservation and use of biological diversity.

Principle 11: The ecosystem approach should consider all forms of relevant information, including scientific and indigenous and local knowledge, innovations and practices.

Principle 12: The ecosystem approach should involve all relevant sectors of society and scientific disciplines.

Annex B

National Ecosystem Assessment: Joint response from Wildlife and Countryside Link and Wales Environment Link to Defra's Stakeholder letter

December 2008

1. Introduction

Fifteen voluntary organisations concerned with the conservation, enjoyment and protection of wildlife, countryside and the marine environment have joined forces under the umbrella of two UK Link organisations (Wildlife and Countryside Link and Wales Environment Link). We welcome the proposal made by the Rt Hon. Hilary Benn MP, Secretary of State for the Environment, for the preparation and commitment of £500,000 for an Ecosystem Assessment for England. We support the principle that the proposed assessment follows the approach taken in the Millennium Ecosystem Assessment 2005 and congratulate Defra for the work they have done so far in developing their "ecosystem approach". We urge the other devolved administrations to take similar budgetary commitments to ensure a robust UK response.

Wildlife and Countryside Link brings together 38 environmental voluntary organisations in the UK united by their common interest in the conservation and enjoyment of the natural and historic environment.

Wales Environment Link (WEL) is a network of 29 environmental and countryside Non-Governmental Organisations in Wales, most of whom have an all-Wales remit. WEL is officially designated the intermediary body between the government and the environmental NGO sector in Wales.

This response is supported by the following organisations:

- Anglers' Conservation Association
- Association of Rivers Trusts
- Badger Trust
- Bat Conservation Trust
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation
- Friends of the Earth England
- The Grasslands Trust
- Plantlife International
- Pond Conservation
- Royal Society for the Protection of Birds Cymru
- Salmon & Trout Association
- The Wildlife Trusts
- Wildfowl & Wetlands Trust
- Woodland Trust

2. General comments

The two Link organisations as umbrella bodies, and their individual constituent members, have much to offer the development of an Ecosystem Assessment. We are keen that in developing the analysis, Defra makes wise use of the wealth of data and studies already describing the provision of ecosystem services from the UK landscape, and make any outputs as tangible and easy to communicate as possible. We urge those developing the project to remain as transparent as possible throughout the development of the project, and to provide timely updates. A final report that could be readily understood by the 'interested public' would help us all by raising the profile of the services that we all gain from the natural environment.

Link* can potentially play as important a role as the LWEC (Living With Environmental Change) members. We hope that the analysis will give due consideration to the fact that it is inherently difficult to quantify the full breadth of ecosystem services (e.g. spiritual replenishment, and many of the regulatory services), and therefore develop methodologies that recognise this. Furthermore, we welcome Defra's financial commitment to the assessment and suggest that a similar financial commitment from all the devolved governments is required.

3. Geographic scope

Link supports the notion of a UK-level assessment and suggests that engagement with Link could facilitate NGO sector engagement. Wildlife and Countryside Link focuses on Westminster and Whitehall and deals mostly with England related policy issues or UK wide issues which are dealt with by the UK Parliament. It should be noted that for issues related to and/or affecting Scotland, Wales or Northern Ireland, there is a Link organisation in each of the devolved administrations - Northern Ireland Environment Link (NIEL), Scottish Environment Link (LINK), and Wales Environment Link (WEL).

As a UK-level assessment, we suggest that Government should invite each of the four Link umbrella organisations of the devolved administrations and their constituent members to be part of the stakeholder community for the assessment.

4. Leadership and expert panel

It is of some concern that the assessment is to be led by a LWEC partnership that does not include representation from the NGO sector. Again, given Link's broad membership, engagement via Link could enable this gap to be filled efficiently and effectively. Link should be included on the 'register of interest' and individual NGOs should be directly approached for their involvement where their expertise is relevant and Link is able to advise Defra on who may be best placed.

5. Data and information

The Defra funded project '*Ecosystem Service Assessment: Valuing the UK BAP (Defra Project SFFSD 0702)*' undertaken by Aberystwyth University identified several

* Use of the term 'Link' in this joint response refers collectively to Wildlife and Countryside Link, and Wales Environment Link

barriers early in the process to directly link ecosystem services to habitats and species. We would be interested to understand whether progress was made in determining solutions to these barriers, and if so, whether they can be taken account of in relation to case studies for the National Ecosystem Assessment.

There is a range of evidence initiatives not included in Annex B which Link members could advise on. In the current timescale of this consultation, we have been unable to gather a comprehensive list but would welcome a further opportunity to add to this. As a minimum, we urge the inclusion of appropriate regional and local projects as well as national datasets and initiatives.

There are a number of Link member organisations that have datasets that would be useful to the assessment, for example Woodland Trust has a number of relevant datasets including space for people and spatial mapping using the BEETLE model.

6. Level of detail

Whilst we support the notion of using this assessment to provide a 'big picture', recognition should be given to the various scales to which ecosystem services can be linked, from the landscape scale (such as river catchments) to micro-habitats (for example a small river tributary). Recognition is also required of processes which operate across landscapes and habitats, such as pollination. We would advise against a detailed species-based approach towards attempting to quantify ecosystem service value, unless a species truly stands alone independent of the habitat in which it is found.

A particular element missing from existing ecosystem function research relates to correlating ecosystem quality to capacity to provide quality services, and identifying 'tipping points'. This kind of detail would add value to how we all work and plan for the future. In addition to both detailed and bigger picture overviews, it would be useful to generate outputs that can be readily understood by our members so that we can help them further understand the multiple benefits derived from the natural world.

7. Valuation of services

Link remains concerned at pressures to place financial valuation on all ecosystem services and therefore the species and habitats which comprise ecosystems. It would be detrimental both to our overall valuation of the natural environment and approaches to its conservation if biodiversity were to be split into financially valuable and non-financially valuable components based on the inappropriate or forced use of existing economic valuation systems.

**Wildlife and Countryside Link and Wales Environment Link
December 2008**