

Submitted to Consultation on environmental targets
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Introduction

Developing target proposals

Responding to this consultation

1 What is your name?

Name:
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2 What is your email address?

Email:
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3 What is your organisation?

Organisation:
Bat Conservation Trust

4 Would you like your response to be confidential?

No

5 If you answered Yes to this question, please give your reason.

Please explain why you would like your response to be confidential.:

Target proposals for biodiversity on land

6 Do you agree or disagree that the proposed combination of biodiversity targets will be a good measure of changes in the health of our 'biodiversity'?

Disagree

7 [If disagree] What additional indicators do you think may be necessary?

Please explain what additional indicators do you think may be necessary?:

Terrestrial Protected Sites (SSSI) condition:

To ensure that all the key components of nature are included this should comprise those categories given as biodiversity targets but it is noted that a metric for a vital aspect of habitat quality is missing. That is the land designated as protected sites. A terrestrial protected sites condition target is vital along with a condition target for the wider habitats. Protected areas should be at the heart of a resilient ecological network but need to be more than lines on a map if they are to support nature's recovery - the threatened species and habitats features (Features of Interest) for which they are designated should be in good or actively recovering condition. Non-binding targets in various policy documents over decades have failed to result in improvements to these sites. What is needed to deliver change is a legal underpinning. However, the protected sites network is to be rebranded, it will still require better protection, better monitoring and better management, underpinned by a legal target to drive progress.

2030 and long-term species abundance targets

8 Do you agree or disagree with the level of ambition of a 10% increase proposed for the long-term species abundance target?

Disagree

9 [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Please provide reasons for why the government should consider a different level of ambition?:

We welcome the development of this target and the work being done to finalise a robust species abundance indicator. This will be vital as a measure of progress. The target seems to signal positive ambition but it is out of step with the other proposed Environment Act targets whose reference points are generally 2022. Having a future as the baseline that will not be known until 2030 makes it impossible to comment on the level of ambition of this target. It gives the rest of this decade when there is likely to be an ongoing decline until 2030 is reached. So this ambition of at least a 10% increase on that baseline might at best, get us back to where we were in 2022 or may result in less than 2022 but still be seen as having achieved the target set. This target

would be far more meaningful if it 10% or greater increase on current abundance at 2022, or at least a figure as projected to incorporate the time period from 2022 to 2042, even if there is an anticipated non-linear progression in achieving this. It is only this approach that will drive the necessary degree of change to bring about the scale of change needed for nature's recovery which means a clear remit for delivery for species under ELM schemes, in Biodiversity Net Gain, through Local Nature Recovery Strategies, management of protected sites and landscapes, Species Conservation Strategies and through Species Recovery Programmes.

Having the trends broken down spatially and by species/habitats will allow more understanding to be gained of the underlying processes and potential cause and effect of progress or the lack of it. It will also give a chance to ensure that we are not increasing abundance at the cost of loss of diversity. The more this can be understood at a regional or local scale the better. Data will not be available for all species at that scale but a set of indicator species may provide an early insight.

Long-term species extinction risk target

10 Do you agree or disagree with the ambition proposed for the long-term species extinction risk target to improve the England-level GB Red List Index?

Disagree

11 [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Please provide reasons why the government should consider a different level of ambition.:

We are pleased to see a target to reduce species extinction risk by 2042 but in its current format this is not a strong or reportable target.

The target 'to improve the England-level GB Red List Index (RLI) by 2042, compared to 2022 levels' does not give any scale of ambition against which to measure except to improve. Whilst that is welcome in its own right, there does need to be a greater level of detail on what scale of improvement. There is otherwise the risk that any method used that shows any level of improvement, however small, will be deemed as having achieved the target. We are aware that there will be confidence intervals around the change seen in the Red List Index and that it will be very difficult to give an overall meaningful percentage increase when spread across 800 species and also that achieving major change will be slow to be evidenced. However, there does need to be a more meaningful target against which to report, even if those changes are understandably small and could include a measure of overall changes in classification.

So a preferred alternative target would be 'to reduce the number of species classed as Critically Endangered, Endangered, Vulnerable and near threatened and to eliminate human-induced extinctions of known threatened species in England by 30% by 2042'. This would use the England-level GB Red List Index (and 'threat score' is the numerator of the index). The numerator or 'threat score' of a Red List Index value, as suggested by Wildlife and Countryside Link, is the number of status improvements (a move of one Red List category) that would be needed to take all species to Least Concern. For communications purposes a target could be set in terms of an absolute or proportional decline in the initial number of status improvements needed; a reduction in 'threat score'.

Whilst Red lists are important and can have their uses in applications such as this, there are areas of concern in their use which need to be fully taken into account. These include:

(i) That Red Lists were not meant for this type of quantitative use.

(ii) The proposed England-level GB Red List Index has not been peer-reviewed or

published. As such, it is undeveloped and untested. It is therefore of concern that detail about the Red List index will not be available until September, which leaves insufficient time to assess the validity of the metric before the laying of the target's statutory instrument by the end of October.

In general with red lists there are concerns as:

(iii) There is an issue with the many species being data deficient which means the true level of threat across taxa is imperfectly known.

(iv) Red Listing is highly reliant on recent trends, so this approach misses consideration for species which have been slowly declining for decades. All of which make up a key element of our biodiversity crisis.

(v) Based on the standard red list categorisation, we would have to wait until declining species (such as hedgehogs) are seriously crashing before they are listed.

(vi) The local scale of extinction risk needs to be taken into account. Summarising into national figures misses localised declines linked to anthropogenic impacts via land management and land use.

Long-term wider habitats target

12 Do you agree or disagree with the level of ambition of 'in excess of 500,000 hectares' proposed for the long-term wider habitats target?

Disagree

13 [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Please provide reasons why the government should consider a different level of ambition.:

Laudable and good that the start date is 2042 but needs to embed something that gives longevity to these gains. We also need to see that this figure is on top of losses, so a net gain of this level of wildlife-rich habitats. We would also want to see that this was maximising biodiversity outcomes so the right habitats in the right places, as underpinned by the Local Nature Recovery Strategies, Species and Habitat Conservation Strategies and Species Recovery programmes. There is a push to bring woodlands back into active management (i.e. opening up, coppicing) with the reason given being to improve biodiversity. Lack of management is seen to have a negative impact on woodland biodiversity but the needs of woodland obligate species must be considered or minimum intervention profiled as an important form of woodland management. Otherwise the very species most reliant on woodland could be the species (already rare) that decline and are lost.

14 Do you agree or disagree that all wildlife-rich habitat types should count towards the target?

Agree

15 [If disagree/Don't know] Are there any habitat types that you think should not count towards the target?

other habitat types that you think should not count towards the target:

16 What reasons can you provide for why these habitats should not count towards the target?

Please provide reasons why these habitats should not count towards the target.:

Terrestrial Protected Sites Target

Target proposals for biodiversity in the sea

17 Do you agree or disagree with the level of ambition proposed for the Marine Protected Area target?

Don't know

18 [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Please provide reasons why the government should consider a different level of ambition.:

No Comment as not our area of expertise

Target proposals to improve water quality and availability

Abandoned Metal Mines

19 Do you agree or disagree with the level of ambition proposed for an abandoned metal mines target?

Don't know

20 [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Please provide reasons why government should consider a different level of ambition.:

No Comment as not our area of expertise

Nutrient Pollution

21 In addition to the proposed national target, we would like to set out ambitions for reducing nutrient pollution from agriculture in individual catchments. Do you agree or disagree that this approach would strengthen the national target?

Don't know

22 [If disagree] Why don't you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target?

Please provide reasons Why don't you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target.:

No Comment as not our area of expertise

23 [If agree] Why do you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target? What factors should the government consider when setting these ambitions?

Please provide reason why you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target and factors the government should consider when setting these ambitions.:

Nutrient pollution from wastewater

24 The target needs to allow flexibility for water companies to use best available strategies to reduce phosphorus pollution, including the use of nature-based and catchment-based solutions. Do you agree or disagree that the proposed target provides this flexibility?

Don't know

25 [If disagree] What reasons can you provide for why the target doesn't give this flexibility?

Please provide reasons why the the target doesn't give this flexibility.:

No Comment as not our area of expertise

26 Do you agree or disagree with the level of ambition proposed for the nutrient targets?

Don't know

27 [If disagree] What reason can you provide for why government should consider a different level of ambition?

Please provide reasons for why government should consider a different level of ambition.:

No Comment as not our area of expertise

Water Demand

28 Do you agree or disagree with the level of ambition proposed for a water demand target?

Don't know

29 [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Please provide reasons why the government should consider a different level of ambition.:

No Comment as not our area of expertise

Target proposals for woodland cover

30 Do you agree or disagree with the proposed metric for a tree and woodland cover target?

Agree

31 Do you agree or disagree that short rotation coppice and short rotation forestry plantations should be initially excluded from a woodland cover target?

Agree

32 Do you agree or disagree with the proposed inclusion of trees in woodlands, as well as trees in hedgerows, orchards, in fields, and in towns and cities?

Agree

Why we are proposing it at this level

33 Do you agree or disagree with our proposed level of ambition for a tree and woodland cover target?

Agree

34 [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Please provide reasons why the government should consider a different level of ambition.:

We agree with the principle behind the approach being taken in the proposed metric and appreciate all the work that has gone into determining this and the level of ambition of the target. We do have a few observations to make.

We are pleased to see that the consideration of benefits wider than the carbon capture are recognised and these include flood prevention, air and water quality and biodiversity benefits. Also that it is recognised that coniferous cover can be detrimental to all but the carbon capture ambition. We also appreciate the consideration of where the planting should take place to maximise benefit and avoid incursion onto other habitats of significance. We assert that delivery of this target should be based on the Lawton principles and link to Local Nature Recovery Strategies. However, we do not see mention specifically of the consideration of protected and priority species needs when it comes to the planting of this woodland. This is a vital missing step. To include this would allow this target not only to link to the habitats target, but would also relate to progressing the species targets and require that planting needs to be evidence based and include the need to consider possible impacts to protected and priority species.

Existing woodlands and their importance must not be lost in the ambition to achieve this target. There is a push to bring woodlands back into active management (i.e. opening up, coppicing) with the reason given being to improve biodiversity. Lack of management is seen to have a negative impact on woodland biodiversity but the needs of woodland obligate species must be considered or minimum intervention profiled as an important form of woodland management. Otherwise the very species most reliant on woodland could be the species (already rare) that decline and are lost. We agree and welcome the inclusion of trees in woodlands, as well as trees in hedgerows, orchards, in fields, and in towns and cities. We would caution that domestic carbon credits targets should not overtake biodiversity gains, leading to fast-growing conifers being planted.

Target proposals for resource efficiency and waste reduction

35 Do you agree or disagree with the proposed scope of the residual waste target being 'all residual waste excluding major mineral wastes'?

Don't know

36 [If disagree] What reasons can you provide for why the government should consider a different target scope?

Please provide reasons why the government should consider a different target scope.:

No comment as not our area of expertise

Proposed metric for reducing residual waste

37 Do you agree or disagree that our proposed method of measuring the target metric is appropriate?

Don't know

38 [If disagree] What reasons or potential unintended consequences can you provide or foresee for why the government should consider a different method?

Please provide reasons or potential unintended consequences you can provide or foresee for why the government should consider a different method.:

No comment as not our area of expertise

39 Do you agree or disagree that local authorities should have a legal requirement to report this waste data, similar to the previous legal requirement they had until 2020?

Don't know

Why we are setting it at this level

40 Do you agree or disagree with the level of ambition proposed for a waste reduction target?

Don't know

41 [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Please provide reasons why the government should consider a different level of ambition.:

No comment as not our area of expertise

Resource productivity

42 Do you agree or disagree with our proposed metric for considering resource productivity?

Don't know

43 [If disagree] What reasons, or potential unintended consequences can you provide for why the government should consider a different metric and what data exists to enable reporting for this alternate metric?

Please provide reasons, or potential unintended consequences you can provide for why the government should consider a different metric and what data exists to enable reporting for this alternate metric.:

No comment as not our area of expertise

44 Of the possible policy interventions described, which do you think will be most effective to meet a resource productivity target? Please specify whether these policies would be most effective if implemented nationally or regionally, and whether measures should be product or sector-specific.

Please provide of the possible policy interventions described, which you think will be most effective to meet a resource productivity target. Please specify whether these policies would be most effective if implemented nationally or regionally, and whether measures should be product or sector-specific.:

No comment as not our area of expertise

Target proposals for air quality

45 Do you agree or disagree with the level of ambition proposed for a PM2.5 concentration target?

Don't know

46 [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Please provide reasons why the government should consider a different level of ambition.:

No comment as not our area of expertise

47 Do you agree or disagree with the level of ambition proposed for a population exposure reduction target?

Don't know

48 [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Please provide reasons why the government should consider a different level of ambition.:

No comment as not our area of expertise

Monitoring and evaluation of our suite of targets

Glossary

Annex: Criteria and principles for developing Environment Act Targets

Consultee Feedback on the Online Survey

49 Overall, how satisfied are you with our online consultation tool? Please give us any comments you have on the tool, including suggestions on how we could improve it.

Satisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it. :

One section (woodland cover) did not have boxes for comments with each question, only at the end