



Wildlife and  
Countryside



## The review of the UK Biodiversity Action Plan

This paper sets out the views of Link organisations on the current review of the UK BAP. It builds on the issues identified in “*Sustaining Biodiversity: revitalising the Biodiversity Action Plan process*” published by the country Link organisations in 2004 and is informed by our involvement in the Biodiversity Reporting and Information Group (BRIG) and its subgroups responsible for the 2005 review. We offer it as a positive and timely contribution to the process and seek agreement from statutory biodiversity partners on the principles that it contains.

Specific issues which we believe require action are highlighted throughout the paper, and are summarised here for clarity:

- NGOs remain committed to being major partners in the UK BAP and country BAPs, so long as these can deliver the conservation and recovery of wildlife and habitats.
- The BAP needs stronger leadership. All those involved in BAP decision-making, across the statutory and voluntary sectors, should be champions who drive positive change.
- Priority-setting, reporting and associated co-ordination should continue to operate at a UK level but we recognise the importance of the country strategies/policies in providing the environment for implementation.
- The UKSC and Country groups/fora should commit to a full review of the UKBAP in 10 years’ time but there also needs to be a ‘fast-track’ process to respond to significant changes in the interim.

### Review of priority species and habitats

- The list resulting from the application of the agreed biological criteria<sup>1</sup> and a quality check on their use<sup>2</sup> should be the revised **UK BAP priority list** and be published by **March 2006**.
- Each administration should have a country priority list, with relevant UK priorities at their core. Biodiversity groups in England, Wales and Northern Ireland should set a timetable for the completion of their priority review (and we urge this list to be legally underpinned in Northern Ireland, as it is elsewhere in the UK).
- Transparent, data-led criteria (including rate of decline at country level) should be used to select country-specific additions.

### Targets

- Every species and habitat on the revised BAP priority list should have SMART biological targets, though some priority species, in particular those in the marine environment, may require a short-term research target to enable a meaningful biological target to be set within a defined time-period, e.g. five years.
- Targets for individual species should not be ‘lumped’ as this distorts reporting, but it may be useful to ‘group’ the delivery mechanism for species and habitats where this will result in greater efficiency and enhanced implementation.

<sup>1</sup> Formerly referred to by the Priority Species and Habitats Review Working Group as ‘stage 1’

<sup>2</sup> Formerly considered by the PSHRWG to be part of ‘stage 2’.



Wildlife and  
Countryside



## Conservation delivery and reporting

- Each priority species and habitat should have a Lead Partner/Agency and the importance of this role and the value of these individuals in co-ordinating biodiversity conservation should be recognised by all participating organisations/agencies.
- A variety of methods may be used to deliver the targets, but SAPs/HAPs will still be appropriate in many instances, though they could be briefer documents.
- Reporting should continue at a UK level, with the web-based system enabling reporting on country-specific priority species and habitats at the same time.
- A more strategic approach to habitat monitoring is necessary if any assessment is to be made of progress on the 2010 EU target to halt biodiversity loss and towards Favourable Conservation Status of EU Habitats Directive priorities. As a prerequisite, the JNCC interpretation manual for UK priority habitats is needed.
- Resources need to be available to ensure that work is properly co-ordinated and delivered.

## 1. Introduction

Members of Link organisations in England, Scotland, Wales and Northern Ireland have played an integral role in the development of the UK Biodiversity Action Plan (UK BAP). From the outset, we have seen the BAP, and the subsequent biodiversity/environment strategies in each country of the UK, as a joint endeavour with government.

The Links' members are the Lead Partners or Joint Lead Partners for 209 (53%) of the 391 Species Action Plans that have been produced, and are delivering conservation work through thousands of volunteers and the donations of over 7 million supporters. Some of the most high profile successes of the UK BAP, such as otter, stone-curlew, large blue, pink seafan and basking shark are led by Link members. Non-governmental organisations are translating the objectives and challenges of the UK BAP into a real experience for millions of people, including many young people through the education system and youth groups. The Links' members are represented at every tier of biodiversity conservation policy, from the UK Standing Committee to every Local Biodiversity Action Plan.

We believe that the UK BAP has played a critical role in prioritising, organising and championing the conservation of species and habitats in the UK. The current review is a timely opportunity to assess the success of the work delivered so far, and the structures that support it. The Links' members firmly believe that the next decade will be equally important, consolidating the achievements and re-doubling efforts to bring threatened and declining species and habitats into favourable status. We are committed to playing our part in delivering the biological targets and guiding the strategies, helping the government to achieve its commitment to halting the loss of biodiversity by 2010.

## 2. Maintaining the UK integrity and the devolved implementation of the BAP

We fully support the devolved implementation of the BAP, through country strategies and administrations. We believe that the country strategies should identify the policies *and* funding that will drive change to improve the status of all species and habitats. They must also recognise the 'fine-tuning' that may be required at a local level to deliver each country's contribution to the UK target.

However, it is of vital importance that species and habitat priorities are set and that progress is recorded at a UK level. We believe this provides an effective framework for the delivery of



Wildlife and  
Countryside



work on the ground and ensures that conservation is delivered efficiently and with shared ideas and resources. The UK has a duty to report to the Convention on Biological Diversity and to the EU on evaluating progress on the 2010 target. This would be more complicated, and prone to greater error, if undertaken at a sub-UK level. We believe that the country administrations would need to draw on the same expertise for individual country reviews as needed for a UK review and this would be inefficient and time consuming. Moreover, many NGO Lead Partners and individual volunteer specialists do not have the capacity to operate separately in all four countries without considerable further support.

We strongly support the role of the UK Standing Committee in this process, and look to it to provide leadership that is commensurate with the vision set out in the UK Action Plan in 1994. **We seek continued support from all Country Groups that priority-setting and monitoring should continue at a UK level, as should co-ordination of action where appropriate.**

### **3. Identifying UK species and habitat priorities**

We fully support the continued focus on species and habitat priorities selected for biological reasons, based on scientific criteria and through a transparent and consultative process. We commend the work that BRIG has achieved so far and the efforts it has made to involve a wide range of taxonomic and conservation expertise. We believe that the BAP must be dynamic and responsive to both new information and conservation needs. We are concerned that it will lose its relevance if the re-setting of priorities is allowed to drift.

We strongly believe that the production of the UK BAP priority list should be achieved by the application of the agreed biological criteria (formerly referred to by the PSHRWG as stage 1) and appropriate quality assurance on their use (formerly part of PSHRWG stage 2). The process must not be corrupted by a desire to shorten the priority list for political or financial reasons. To do so would seriously undermine NGO and amateur enthusiast support for the UK BAP. If the listing process is to be worthwhile, the conservation status and importance of species and habitats must be fully reflected in the UK BAP priorities. This requires broad agreement from the statutory and voluntary sector about the quality assurance criteria and their application. For example, we would oppose the removal of species from the BAP list simply because they are difficult to study or because it is perceived that they are threatened by factors beyond our collective ability to control, such as climate change. Removing qualifying species unless on sound ecological grounds will make it less likely that the 2010 target can be properly assessed or achieved in the UK.

**The UKSC must give BRIG a clear lead in agreeing which group will make the final decision to confirm the UK priority list and how country groups should be involved, in order that the process can be effectively project managed to its conclusion. To ensure the UK BAP maintains broad support from those responsible for achieving nature conservation, the new UK priority list should be published by the deadline set of March 2006.**

The publication of the UK BAP priority list must be completed by this deadline in order that the next stage, the identification of appropriate implementation mechanisms<sup>3</sup>, can be completed by December 2006. Implementation mechanisms will need to be agreed, lead partners appointed, targets agreed (for new priorities) and, where necessary, Action Plans

---

<sup>3</sup> This stage is a combination of some of the factors the PSHRWG has previously referred to within stages 2 and 3.



Wildlife and  
Countryside



produced. It is vital that the whole review is complete by December 2006 if meaningful work is to be undertaken by partners before the next reporting round in 2008, the last benchmark of progress before 2010.

Following the decision of the PSHRWG marine subgroup that the review of marine features failed to meet quality assurance standards **there is an urgent need for an adequately resourced and thorough review of marine species and habitats priorities to be carried out.** This needs to make the best use of available information and should be completed by the December 2006 deadline. It is essential that marine species and habitats are included in the review process but difficulties over the marine review should not be allowed to delay progress of the rest of the priority review.

Ultimately, the success of conservation action will be judged by how few or how many species and habitats are listed as priorities by future reviews. We recognise that the 2006 list may be longer than in 1998. This in part reflects improved monitoring (for terrestrial and freshwater species) but it also reflects that there is a worsening situation for some groups of organisms (for example, 70% of butterfly and moth species are now known to be in decline).

#### 4. Devolved species and habitat priorities

We fully support the UKSC's view that priority species and habitats should be identified at a UK level and strongly believe that **the species and habitats relevant to each country from this list should form the core of the priority lists required by legislation in England, Wales and Scotland.** Although currently without a similar legal mandate, we believe that **the relevant species and habitats should form the core of a priority list in Northern Ireland and that measures should be put in place to legally underpin the adoption of this list by government.**

We firmly believe that the principles adopted by BRIG in the UKBAP review should be used to identify additional priorities for each country list. We hope that the list to be adopted under the Nature Conservation (Scotland) Act will incorporate the relevant UK priorities *and* Scottish priorities selected by similar criteria (focussing on declines at country level), and **we urge the biodiversity partnerships in England, Wales and Northern Ireland to set a timetable for the completion of a review in each country,** building on the revised UK BAP priorities.

Where a country priority is identified, a Lead Partner/Agency should be appointed to co-ordinate action and reporting. **We believe that the UKBAP reporting round every three years could be extended to accommodate reporting on progress against these country-specific priorities** (some of which may be common to more than one administration) including drawing on information, where readily available, for those priorities from other countries. This should help to raise awareness of declines in different countries and the potential need to consider wider conservation action in the future.

#### 5. Biological targets for priority species and habitats

Experience shows that setting biological targets for species and habitats is the most honest and effective way to assess the delivery of wildlife conservation. Targets also help drive and inspire conservation action, target limited resources and generate funding.



Wildlife and  
Countryside



We believe that **every species and habitat on the UK priority list should ultimately have a numerical target which, as a minimum, aims at no net reduction in its status**, though we recognise that some novel adaptations may be necessary, especially in the marine environment. Many depleted species and habitats should also include a recovery or restoration target. We support the approach taken by BRIG for the existing BAP priorities, and **urge that a similar approach is taken rapidly for the newly-identified priorities after the completion of the priority review.**

For some species there will be insufficient information on which to base SMART biological targets. In particular, there will be insufficient ecological and population information about some of the new priority species and many of the existing marine priority species and habitats to set SMART targets. For these, **it should be acceptable to set research targets rather than biological targets for, say, five years hence, with an expectation that enough will be known by then to set ecological objectives** (unless the results suggest that the species no longer meets priority criteria). 'Research priority' species and habitats should be considered of equal status to those for which initial ecological understanding has been gained and must not be 'relegated' to the status of 'statements' as in the late 1990s, without action or assessment. Framed by a research-focused SAP/HAP, this should act as an impetus to accomplish the actions necessary to achieve measurable outcomes, requiring co-ordinated input from the statutory and voluntary sectors. These research targets should be monitored and publicly reported on. The UKSC should encourage BRIG and BRAG to work more closely to determine strategic research priorities and promote funding packages to deliver them.

The Links' experience is that 'grouped' targets, which cover several species, are complicated and, where some species within the target are increasing yet others decreasing, this can distort reporting. Thus **we believe that targets incorporating more than one species or habitat should not be permitted**, but we endorse the concept that grouped action can streamline conservation delivery, where the specific threats impact a suite of species/habitats at similar temporal and spatial scales.

## 6. Implementation of conservation action

Following the production of the list of priority species and habitats, the next stage<sup>4</sup> of the review will determine how the conservation of the priority species and habitats should be delivered. We would urge that NGOs, who collectively have considerable experience of implementing action plans and other mechanisms, are closely involved in this stage of the review.

The Links' members do not presume that a long and detailed action plan is necessary for every species and habitat. Conservation policy has developed over the last decade such that biological targets, an assessment of status and threats, and the likely key solutions are sufficient for headline communications.

However, Action Plans will still be appropriate for species and habitats requiring research, specific monitoring, and dedicated recovery work that cannot be achieved by generic land/marine resource use change alone. In determining the outcome of this stage, **BRIG should assume that a SAP/HAP is necessary unless there is a convincing argument**

---

<sup>4</sup> Formerly this has been referred to as stage 3.



Wildlife and  
Countryside



**otherwise.** Examples of where an individual plan might not be necessary are: where there are well-funded agri-environment scheme prescriptions, in *all* the relevant countries; or the delivery of habitat restoration under a HAP, are likely to achieve the targets. The decision as to whether target delivery can be achieved through a non-Action Plan mechanism depends on the threats identified at the listing stage. It also relies on a rapid re-evaluation of information including *Making the Links*, identifying which species are associated with which habitats, and **we urge BRIG to commission this work to promptly follow the completion of the priority list.** Some information about the key actions to be taken to deliver the targets is necessary to communicate work to the public, to LBAPs and to land managers.

Grouped action may be appropriate as a means of reducing duplication (providing that species targets are not lumped together) and must retain flexibility to deal with the different ecological requirements of each component. The litmus test is whether grouping species and habitats will result in the more effective delivery of biological targets. Grouped action plans should be considered only where there is a similar threat to a group of species *and* where the action on the ground is complimentary or at the same sites. For example, a generic climate change grouped plan would not be appropriate, but two sand-dune species threatened by sea-level rise at the same site(s) might be. **We urge that BRIG seeks expert opinion before confirming that a species target can be delivered through a HAP** – for example, a specialised invertebrate may rely on a sub-habitat feature that is not well-catered for by broad-scale habitat management. We believe that greater flexibility can be retained by producing individual plans. It is always possible to deliver single plans in a grouped manner through coordinated allocation of resources and responsibilities, but ensuring individual requirements are met through a grouped plan is much harder to achieve. The waxcap fungi provide one example of where single species plans have been delivered efficiently by grouping common actions.

Each priority species and habitat should have a nominated Lead Partner/Agency and statutory contact point, responsible for ensuring that conservation action, monitoring and reporting is undertaken, including by groups responsible for country biodiversity strategies. This **Lead Partner approach has worked well to date, and we seek assurance that this structure will continue.** We would urge that the importance of the Lead Partner role and the value of these individuals in co-ordinating biodiversity conservation is recognised by all participating organisations/agencies.

Getting the delivery mechanisms for priority species and habitats right is an integral part of the continued success of, and support for, targeted biodiversity conservation in the UK. Therefore, we believe that **BRIG should agree, as a matter of urgency, the criteria for the implementation stage, in order that there is broad consensus across government and NGOs.** It must then effectively project-manage, to an agreed and transparent timetable, this remaining stage.

## 7. Reporting on progress

The Links' members fully support the merits of continuing to assess and report on progress against the targets every three years. This provides an important measure towards the CBD and 2010 Targets, but importantly it provides a check on progress against the statutory duties to conserve biodiversity, with its links to priority species and habitats under Countryside and Rights of Way Act 2000 and the Nature Conservation (Scotland) 2004 Act.



Wildlife and  
Countryside



It also informs periodic reviews of targets. We welcome the work that has been undertaken recently to integrate 2005 reporting as part of BARS, and **seek a continued commitment from the UKSC and the Country Groups to support this simple yet effective form of monitoring and assessment.**

However, this reporting will be severely handicapped without better co-ordinated monitoring (particularly, though not exclusively, of priority marine species and habitats) such that an accurate measure of changing status can be made.

## 8. Habitats

The Links' members have made a significant contribution to various HAP steering groups and are working on the ground to deliver habitat conservation. However, the priority habitats continue to remain a key concern. The Links are keen and willing to contribute NGO input to the habitats review, aimed at seeking a list of habitats that makes biological and conservation sense. It should continue to focus on priorities meeting agreed criteria rather than including all habitats.

Experience of reviewing the HAP targets illustrates that definitions and monitoring remain outstanding concerns. There is a need for agreed, robust and understandable definitions of the habitats, and **we urge the JNCC to complete a comprehensive interpretation manual for priority habitats in the UK** that was promised for spring 2005, and which was reinforced by the Review of Marine Nature Conservation (2004).

Since habitats form part of a wider matrix in the countryside, there is a need for greater strategic co-ordination of monitoring, of both extent and quality beyond A/SSSIs. **We ask the country agencies and administrations to work together to undertake a programme of compatible monitoring that will enable the extent and condition of priority habitats to be monitored across the UK.** Without this, we doubt it will be possible to monitor progress towards the 2010 biodiversity target or assess whether EU Habitat Directive priorities are in Favourable Conservation Status.

While species steering groups seem to work reasonably effectively, some habitat steering groups, where they exist, seem to lack clear focus. For many large-scale habitats, the challenge is clearly far greater, perhaps daunting. These groups may benefit from clearer guidance as to what they are expected to achieve, and may be able to add greatest value by steering monitoring protocols and selecting key areas in which to work. These groups may be helped by having a stronger channel to input into sectoral strategies in each country, and by having a particular responsibility to ensure that habitat restoration responds to the needs of its component species.

## 9. Conclusions

The NGO and voluntary conservation community's commitment to the delivery of targeted biodiversity conservation in the UK remains strong and we believe that the target-led and Lead Partner approach has been validated by its largely successful operation during its first 10 years, in the terrestrial and freshwater environments at least. It can undoubtedly be streamlined, and the UKSC and BRIG should focus on operating the necessary 'bureaucracy' more quickly and efficiently to maintain momentum. These groups should also ensure that similar strides are made in implementing and monitoring species and habitats in the marine environment during the next decade,



Wildlife and  
Countryside



In order to help speed up the current review we would urge **the UK Biodiversity Standing Committee to clarify the decision making process of listing, plan production and the identification of Lead Partners/Agencies.** This is needed to clarify the roles and responsibilities of the different organisations and groups involved in the UK BAP.

**To be successful, the delivery of enhanced biodiversity conservation needs to be properly resourced.** The NGO community will continue to play its part and invest its resources in this work, but natural history enthusiasts and volunteers will only continue to give their time if they have faith that it is making a real difference and that their efforts are being matched by Government commitment. We believe that the UKBAP review will help to target resources to the highest priorities for biodiversity conservation. It may also help to identify where resources are lacking and where the devolved administrations, Government agencies and NGOs should work together to fill these gaps.

All of us involved in supporting the delivery of this work, whether statutory agency, government or NGO, share a responsibility to re-invigorate the process. Without the BAP, the Links' members cannot see how our shared ambitions can be achieved and consider that the progress made during the last decade will be wasted. **The BAP needs stronger leadership at both a UK and country level, to champion the cause; the Biodiversity Reporting and Information Group (BRIG) and the Biodiversity Research Advisory Group (BRAG) need to be able to make decisions in partnership with country groups; and resources need to be available to ensure that work is properly co-ordinated and delivered.**

The Links' members welcome the investment made by the statutory nature conservation organisations (SNCOs) to build capacity among voluntary groups. **We urge SNCOs and devolved administrations to maintain this, and not to constrain this capacity to a single country but to operate at a UK level where necessary.** In a similar vein, **we urge SNCOs and devolved administrations to continue contribute resources to managing the UK process, including the periodic reporting rounds.**

Finally, we propose that **the UKSC should make clear its expectations about future reviews.** Reflecting on the process to date, we suggest that there should be a further full review in 10 years, building on the 2014 reporting round. We would also urge that a mechanism is introduced to enable fast track process for species or habitats priorities (for both additions and deletions) where significant new information becomes available between full 10 yearly reviews.





Wildlife and  
Countryside



**This paper is supported by:**

- Bat Conservation Trust
- Buglife: The Invertebrate Conservation Trust
- Butterfly Conservation
- Herpetological Conservation Trust
- Marine Conservation Society
- National Federation for Biological Recording
- National Trust for Scotland
- Plantlife International
- Pond Conservation: The Water Habitats Trust
- Royal Society for the Protection of Birds (RSPB)
- Royal Zoological Society of Scotland
- Scottish Native Woods
- The Wildlife Trusts
- Wildfowl & Wetlands Trust
- Zoological Society of London