



Species Survival Working Group

27 June 2022

Dear Sir/Madam

International Union for Conservation of Nature (IUCN) National Committee UK (NCUK) Species Survival Working Group (SSWG) response to the 'Consultation on environmental targets' (England) in relation to Sections 1-3 of the Environment Act 2021

IUCN is a membership Union composed of both government and civil society organisations, including the UK Government and many other organisations in the UK. It harnesses the experience, resources and reach of its more than 1,400 member organisations and the input of more than 18,000 experts globally. This diversity and vast expertise makes IUCN the global authority on the status of the natural world and the measures needed to safeguard it.

The NCUK Species Survival Working Group (SSWG) has been established to support the work of the IUCN [Species Survival Commission](#) (SSC) and its work programme and initiatives. The SSC is an IUCN Commission that comprises a network of 10,500 experts from almost every country in the world and is responsible for the well-known [IUCN Red List of Threatened Species](#). Within its UK scope, SSWG aims to assist in reversing biodiversity loss and help to achieve domestic targets by providing independent strategic analysis and advice.

Whilst the proposed terrestrial biodiversity and freshwater targets set out in the consultation provide a (broad) basis from which to work, they lack sufficient ambition and scope to fully address the current biodiversity crisis. SSWG has significant interest in the consultation and in i) the eventual outcomes of any policy changes that affect which species are considered within an abundance index, ii) how extinction risk is calculated and monitored and iii) the identification and extent of habitat protection in order to ensure species protection is as comprehensive and ambitious as is needed.

We aim to fully contribute to and support all the UK Governments and Devolved Administrations across the UK in applying the IUCN principles and guidance on setting ambitious targets to prevent any further decline and set the direction for recovery of our biodiversity.

In response to the questions relating to the biodiversity targets (for England), our key concerns and recommendations are:

- the baseline for the species abundance target and proposed recovery (10% on 2030 levels by 2042) are not ambitious enough and risk lower biodiversity levels than we have today.

- We recommend setting a baseline of 2022, in line with other proposed Environment Act targets, and a higher target of at least 20% – in line with ambitions being set by the CBD – to ensure nature is on a trajectory to recover by 2050.¹
- The species representation within the species abundance target is far too narrow and unrepresentative of all taxa and of all habitats; without a fuller suite of species represented across taxonomic groups, it will be impossible to truly measure efforts to restore thriving (i.e. fully functioning biologically) ecosystems within different habitats.
- The number of species and taxa represented in the abundance target, and the type of data used, must be as broad as possible. Incorporating opportunistically collected data on a broader group of species offers a chance to assess the overarching target using two complimentary datasets. It is also important that the index is accompanied by a full breakdown by key taxonomic group, species and habitat type, and at different functional spatial scales, supported by local case studies.
- Recovery targets must be supported by sufficient resources to achieve the ambitions laid out in the Act.
- There is insufficient representation of the marine environment within targets; we recommend the development of a separate marine abundance/occupancy indicator, as is the case in Scotland.
- We welcome a target that seeks to reduce the species extinction risk by 2042 but feel the target to improve the England-level GB Red List Index (RLI) for by 2042, compared to 2022 levels, is flawed, failing to detail what levels of improvement are required; a quantifiable target is required, we suggest an ambition to reduce the extinction risk to species by at least 30% by 2042 compared with 2022 levels (based on independent analysis carried out for the Wildlife and Countryside Link response to this consultation).
- It is also important to note that the sensitivity of a proposed England-level GB Red List Index to measure possible change in extinction risk is unknown on this timescale and the cost and feasibility, including expert assessor support, of conducting decadal Red List assessments is not detailed in the Impact Assessment.
- The proposal of the wider habitat target to create in excess of 500,000 hectares needs to be more ambitious and outcome-focused; any creation and restoration should be measured alongside loss and degradation and needs to be targeted (for instance selected habitat could be identified as a priority for recovery or enhancement through local strategies). The creation and restoration that needs to be undertaken must be evidence based and considered at relevant spatial scales for different species, habitats etc.
- We recommend the target should be set to at least 750,000ha, which goes beyond the ambition of the 25 YEP, and is in line both with the increasingly urgent need to reverse biodiversity declines and the Government's ambition to protect 30% of land for nature by 2030. The current proposed level represents less than 4% of England's land area; we think it should be no less than the highest level option described within Defra's evidence report which was a level supported by nearly 70% of participants in the workshop. We believe that certain habitat types should not be included, for example non-native (broadleaved woodland is included in the list of medium-distinctiveness habitats but there is no specification that it should be native) and short-lived habitats (such as arable field margins), and that consideration is given to which areas outside the protected area network are key to recovering populations of widespread but declining species.
- Whilst the creation and restoration of new habitat is welcome, there is currently no outcome target focussing on the condition of habitats in England already protected

¹ IUCN, [Post-2020 global biodiversity framework](#)

within designated sites; the majority of our SSSIs are in poor condition but without their restoration, species recovery targets will not be met.

- We recommend inclusion of a target ensuring at least 75% of SSSIs are in favourable condition (in England) by 2042, with the remaining 25% showing signs of recovery.
- As an additional point, we note that this consultation does not include any reference to the biodiversity in the UK Overseas Territories and Crown Dependencies, for which the UK Government also has an important international responsibility. There needs to be consideration of developing relevant biodiversity targets in these geographical locations, in conjunction with the relevant governments or administrations.

Yours faithfully,



Dr. Jo Judge and Nida Al-Fulaj,

Co-Chairs, IUCN National Committee UK's Species Survival Working Group