



27 June 2022

Dear Sir/Madam

International Union for Conservation of Nature (IUCN) National Committee UK Protected Areas Working Group response to the Defra consultation on environmental targets

The mandate and goal of the IUCN National Committee's UK Protected Areas Working Group (PAWG) is to provide independent strategic analysis and advice in support of the aspirations of the UK Government and the Devolved Administrations to protect 30% of the UK's land and 30% of its seas by 2030 (so-called '30 by 30'). We do this using our collective expertise in this subject area and set this out using the various best practice guidelines established under the IUCN's World Commission on Protected Areas (WCPA), as we have done previously through the 'Putting Nature on the Map' project¹.

We aim to fully support the UK Government and the Devolved Administrations across the UK in applying the IUCN definitions and guidance on Protected Areas (PAs) and Other Effective area-based Conservation Measures (OECMs), including relevant ways to ensure and demonstrate their effective management. The Group therefore aims to continue to demonstrate leadership in this area of conservation policy and practice, set within the context of IUCN, and be an independent authoritative 'go-to' supportive network.

We welcome the UK Government's commitment to protect 30% of land and sea by 2030, and the fact that this is supported by the inclusion of a marine protected areas target within the suite of binding targets proposed in the Environmental Targets consultation. We are however deeply concerned by the omission of an equivalent target for protected sites on land.

The consultation reiterates the UK Government's commitment to the recovery of protected sites on land, rightly recognises that improving their condition will be critical in order to meet the proposed targets on species abundance and extinction risk, and yet fails to reflect this through inclusion of a binding terrestrial sites' target to drive this improvement. The justification provided in the consultation document is that it would be premature to set such a target because of the Government's proposals to reform site protections, as set out in the Nature Recovery Green Paper. However, we note that similar proposals in respect of marine protected areas have not been considered a barrier to the inclusion of a target in respect of their condition.

The UK Government has been at the forefront of those demonstrating ambition ahead of the 15th Conference of the Parties on the Convention on Biological Diversity (CoP15), having made a clear commitment to 30 by 30. In our view it is essential that the Government reflects its commitment to delivering on this UK ambition (on land as well as at sea) in the legally

¹ <https://iucn-nc.uk/projects/putting-nature-on-the-map/>

binding targets that it brings forward under the Environment Act in England, and as such we would urge the Government to reconsider its position on a terrestrial protected areas target as a matter of urgency.

Yours faithfully

A handwritten signature in black ink, reading "James A. Robinson". The signature is written in a cursive style with a large initial 'J' and 'R'.

Dr. James A. Robinson, Chair of the IUCN National Committee UK's Protected Areas Working Group

Contact address: The Wildfowl & Wetlands Trust, Slimbridge, Glos GL2 7BT; Email: IUCNUK.PAWG@wwt.org.uk