

# Global Biodiversity Framework

2024 Report on Policy Progress  
Towards Targets in England

Wildlife and  
Countryside



# INTRODUCTION

**Almost two years ago, the world gathered to discuss one of the defining crises of our age: the loss of biodiversity. Across the planet, wildlife populations have plummeted by 69% on average since 1970.<sup>1</sup> Recognising this nature emergency, policymakers, experts and civil society met at the Convention on Biological Diversity of the Conference of the Parties in 2022 (CBD COP15) to aim to agree a new global compact to tackle biodiversity loss.**

This Global Biodiversity Framework (GBF) agreed at COP15 is a landmark agreement that signals a collective intent to create a nature-positive future. To achieve this, it sets out four goals and 23 action-oriented targets, with the overall aim to halt and reverse biodiversity loss by 2030.<sup>2</sup>

The ambition is welcome and needed - but the true test will be effective implementation of the GBF in individual countries. There are now just six years left until 2030 and to achieve the GBF targets. Delaying action will not only risk missing the targets, but also risks further, potentially irreversible, damage to species and habitats in the meantime.

The CBD COP 16, to be held this October 2024 in Cali, Colombia, is an opportunity for countries to report on their progress on implementing the GBF targets and identify and overcome any barriers to action, such as finance and implementation tools. Ahead of COP16, all countries must submit 'National Targets' to the CBD, which should align with the targets in the GBF, and a National Biodiversity Strategy and Action Plan (NBSAP) which outlines what actions each countries will take to achieve the goals of the framework.

The UK played an important role in negotiating the GBF, including the key target to protect and manage for nature at least 30% of land and sea by 2030 (also known as 30x30). Domestic action can help demonstrate the UK's continuing commitment to these targets and action to recover nature, ahead of COP16.



The UK has submitted its 'National Targets' to the CBD ahead of COP16, which align with all the GBF targets.<sup>3</sup> This is an important first step in effective implementation, but must be swiftly followed by the UK's plan to achieve those targets, its NBSAP, which has not yet been published. The UK will submit a single NBSAP to the CBD as the four countries of the UK are represented as a single party at the talks. However, because the environment is a devolved policy issue, each country will be expected to come up with their own plans outlining how the 2030 targets will be met.

Importantly, the UK's NBSAP must not just add up existing policies and actions - it must identify gaps and detail new commitments, action, strategies and finance to make the achievement of the targets a reality. The upcoming review of the Environmental Improvement Plan is an opportunity to ensure England's plans and policies are fit-for-purpose to achieve the GBF targets.

Ahead of COP16, Wildlife and Countryside Link has again assessed to what extent the policy building blocks are in place in England to support the delivery of the GBF targets and where there are gaps (Link also did an assessment in 2023<sup>4</sup>). This tracker focuses on policy progress, not progress on the outcomes of the targets themselves.



It is clear that in many areas, there is a long way to go. None of the targets have been assessed as green, with existing policies likely to meet the target. Many targets are still red, reflecting that existing policies are unlikely to meet the target and that significant improvements are needed to ensure the policy framework supports achievement of the target.

If the UK government is hoping to use the EIP as England's contribution to the UK's NBSAP, it must be strengthened to reflect these gaps during the ongoing review (Autumn 2024) and the updated EIP swiftly published. The UK should publish its NBSAP before COP16 this October 2024, which sets out a robust and funded implementation plan for global targets in the UK, informed by the review of England's Environmental Improvement Plan.

**With a robust action plan for domestic implementation, the UK will be well-placed to enter COP16 negotiations and should show ambitious leadership to ensure GBF targets are met in the UK and internationally. At COP16, the UK Government should also:**


- **Deliver its international finance commitments, in line with the Target 19 aim of £20 billion by 2025, and ensure adequate finance to deliver GBF targets domestically.**
- **Ensure senior Government representation at COP16, including Prime Minister Sir Keir Starmer, David Lammy, Secretary of State for Foreign, Commonwealth and Development Affairs, Tulip Suddiq, Economic Secretary to the Treasury, as well as Steve Reed, Secretary of State for Environment, Food and Rural Affairs, and Mary Creagh, Parliamentary Under-Secretary of State at DEFRA with responsibility for nature.**
- **Show willingness to host COP17 in 2026 in the UK.**

# SUMMARY OF POLICY PROGRESS ON GBF TARGETS IN ENGLAND
































## Analysis Methodology

We have taken into account policies, spending commitments and targets to inform these ratings, and to what extent the cumulative impact of these is likely to have on meeting the relevant target. For some of the targets that cover multiple policy areas, e.g. Target 10 looking at sustainable management in agriculture, fisheries, and forestry, we have provided separate ratings for each of the different areas. For other targets, we have been unable to provide an assessment due to the limited availability of information. Importantly, we have still included these targets in the tracker and encourage the UK Government to address all 23 targets with equal importance in the run-up to 2030.

### Key

-  Policies related to this issue are judged to have gone backwards in terms of progress.
-  Existing policies are unlikely to meet the target with little policy progress. Significant improvements required.
-  There has been some policy progress in this area with some examples of good policies, but more required to meet the target.
-  Existing policies, if delivered, are likely to meet the target.
-  We have not been able to assess policy progress on this target but have included relevant information where possible.

## GBF targets policy tracker for England

1. Spatial planning	Land	
	Marine	
2. Ecosystem restoration	Land	
	Marine	
	Freshwater	
3. 30x30 on land and sea	Land	
	Marine	
4. Species extinction		
5. Wildlife trade		
6. Invasive species		
7. Pollution	Nutrients	
	Chemicals	
	Plastic	
8. Climate and nature		
9. Sustainable use		
10. Agriculture, fisheries and forestry	Agriculture	
	Fisheries	
	Forestry	
11. People and nature		
12. Urban areas		
13. Benefit sharing		
14. Mainstreaming		
15. Business and nature		
16. Consumption		
17. Biotechnology		
18. Subsidies		
19. Finance		
20. Capacity building		
21. Information		
22. Indigenous peoples		
23. Gender		

# 1. SPATIAL PLANNING

Ensure that all areas are under participatory, integrated and biodiversity inclusive spatial planning and/or effective management processes addressing land and sea use change, to bring the loss of areas of high biodiversity importance, including ecosystems of high ecological integrity, close to zero by 2030, while respecting the rights of indigenous peoples and local communities.

## Spatial planning: Land

### Some progress

#### Rationale

Currently, there is no integrated or spatial land use planning in England at a strategic or 'larger than local' level, which would enable planning to take place on a geography closer to that at which ecological processes operate. At a national level, there is no spatial planning at all, let alone spatial planning for biodiversity that is also integrated and participatory. At a local level, spatial strategies for biodiversity are beginning to be developed (known as Local Nature Recovery Strategies), but it is not yet clear that these will be effective. Existing local plan-making and decision-making processes have opportunities to consider biodiversity and other environmental concerns and to consult with local communities, but this is not always effectively implemented.

There have been some positive policy commitments and some policy progress towards participatory, integrated and biodiversity-inclusive spatial planning. The new Government committed in their manifesto and again more recently in their publication of national contributions towards GBF targets to producing a land use framework.<sup>5</sup> It is not yet clear if this document will cover the multiple land uses which

impact on nature, including farming and agricultural land and development. It is also not clear if the land use framework will genuinely influence change on the ground - a high-level policy document will not be effective in doing so. The land use framework must ensure the climate crisis and nature crisis are tackled at the same time - as the climate crisis is one of the driving factors behind biodiversity loss.

The new Government also recently announced that they will introduce formal strategic planning mechanisms for land use planning in England in new legislation in the autumn, in order to move towards a 'model of universal strategic planning covering functional economic areas within the next five years.' However, there is no mention of environmental or biodiversity concerns as being included as part of these strategic planning mechanisms.

Nature is not just lacking proactive mechanisms in the land use planning system in England, it is also poorly protected by the existing rules which regulate development and major infrastructure. Despite recent reviews of the National Planning Policy Framework (NPPF), the Government has foregone these opportunities to put Environment Act and Climate Change Act targets at the heart of the purpose of planning as set out in policy, alongside sustainable development. It has also further expanded permitted development regulations which enable development to take place with fewer checks and balances.

National Policy Statements provide the framework within which Nationally Significant Infrastructure proposals are considered. These currently have no spatial component. While the Government has committed to producing a Strategic Spatial Energy Plan (SSEP) and has previously indicated interest in strategic planning for other types of infrastructure, it is not clear if these will include environmental or biodiversity considerations and how they will actually influence decision-making.

Local Nature Recovery Strategies (LNRSs), which identify local biodiversity priorities and local nature recovery opportunity areas, developed by Responsible Authorities and covering the whole of England, have recently been introduced. There is now a legal link between LNRSs and the land use planning system

through the Levelling Up and Regeneration Act, with local planning authorities now having a duty to 'take account' of LNRs when producing local development plans.

However, it is not yet clear how effective LNRs, including through the new legal link to local development plans, will be on the ground at protecting existing and restoring potentially important local habitats. There is no mechanism to ensure LNRs add up at a national scale. The Nature Recovery Network is a missed opportunity by which to establish an evidence-based national assessment of where to deliver nature's recovery and how to align with existing mechanisms and tools (e.g., Environmental Land Management (ELM) targeting and protected sites), rather than only relying on a bottom-up approach.

### What is needed

- The Government must publish a land use framework which is target-driven, including to achieve the target to protect at least 30% of land by 2030, links to LNRs to ensure they add up to meeting national targets, and that genuinely achieves land use change on the ground by docking into existing land use regimes and regulations, including the land use planning system and environmental permitting.
- The Government must ensure the duty to take account of LNRs is implemented well and with sufficient weight to ensure local development plans steer proposals away from key local nature sites.
- The Government should require local authorities to include local habitat restoration targets in their local plans, along with policies to achieve these, to ensure local plans make space for homes for wildlife alongside homes for people.
- The Government must give stronger and more specific policy for Local Wildlife Sites in national planning policy, to require their inclusion in Local Plans and policies within those Plans to protect Local Wildlife Sites against indirect and direct harm from development.
- The Government should review National Policy Statements for major infrastructure, putting them on a spatial footing with impacts upon nature minimised.

## Spatial planning: marine

### Some progress

#### Rationale

We welcome the Government's commitment to issuing 'no new oil and gas licences' for exploration of potential new sites. This is a positive step towards achieving the UK's net zero targets and tackling climate change which significantly impacts the marine environment, including Marine Protected Areas (MPAs).

In March 2024, the Government announced it would ban bottom towed fishing gear across protected features in 13 offshore MPAs. Improving the condition of many of our most vulnerable reef and rocky habitats and helping to protect vital blue carbon habitats. Similarly, the commitment to close all industrial sandeel fisheries is a welcome pressure reduction measure, to protect important prey for marine predators like seabirds and cetaceans and move towards achieving Good Environmental Status for declining seabird populations.

However, the marine environment in England remains degraded. Damaging activities such as poorly planned infrastructure development and unsustainable fishing practices continue to impact biodiversity across the MPA network. The impact of fisheries on sensitive species remains high, with little plan to minimise and where possible, eliminate bycatch. Despite their internationally recognised value in achieving the GBF targets, blue carbon stores are still not fully recognised and protected.

In the eight months since the previous update, there has not been a single new output from Defra's Marine Spatial Prioritisation Programme and strategic decisions regarding pressure reduction and placement of offshore wind have yet to be made. Moreover, it remains unclear how The Crown Estate's Whole of Seabed approach and DESNZ's SSEP will work with Defra's MSPri Programme to create a fully integrated, interoperable spatial plan for the sea.

We support the Government's plans to publish updated National Policy Statements and urge them to clarify spatial components of Nationally Significant Infrastructure Projects (NSIPs) and provide guidance

on the current 'Critical National Priority' status for offshore renewable energy projects and how these will support biodiversity commitments. Confidence that infrastructure projects will not adversely affect the marine environment must come through policy clarity and certainty and we would expect to see further details from Defra on the Offshore Wind Environmental Improvement Package and updated MPA Assessment consultation response.

### What is needed

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- Establish a Strategic Marine Planning Task Force and Delivery Roadmap for England by the end of 2025. This will inform decisions on the policy priorities required to optimise management of the sea space and must; (a) prioritise sea space for a connected network of nature protection, recovery and enhancement in accordance with Environment Act targets, (b) allocate seaspace for offshore energy production in accordance with (a), (c) develop a detailed and properly funded just transition strategy for activities displaced by (a) & (b), (d) ensure that (a) to (c) in combination achieve Good Environmental Status.
- As on land, the Government must publish a criteria which states what counts towards 30x30, including the definition of 'effective management measures.'
- Conduct a Special Protection Area (SPA) Sufficiency Review at sea to assess where the gaps remain in the MPA network so they can be addressed, and ensure the network of MPAs across English waters is ecologically coherent and truly supports species recovery. The last UK SPA Review published by JNCC highlights that 'review of SPA provision in the marine environment is needed for at least 49 species.'
- Publish Stage Three and Stage Four Byelaws through the Marine Management Organisation (MMO) programme to ensure the MPA network is protected from the most damaging forms of fishing by the end of 2024. MPAs must be protected across the whole site.
- Publish updated guidance on MPA Assessments and the application of the CNP to NSIP projects to ensure renewables work for the marine environment and impact as little of the seascape as possible.

- Ensure time-bounded and meaningful targets and objectives are set in the incoming Fisheries Management Plans (FMPs) are delivering are delivering towards the same goals in the Fisheries Act (2020). Alongside, work to adjust catch limits downward to take into account fisheries activities outside the MPA network and, wherever possible, work in collaboration with the fishing industry to consider sustainable alternatives.

## 2. ECOSYSTEM RESTORATION

Ensure that by 2030 at least 30 percent of areas of degraded terrestrial, inland water, and marine and coastal ecosystems are under effective restoration, in order to enhance biodiversity and ecosystem functions and services, ecological integrity and connectivity.

### Restoration: Land

Little progress

#### Rationale

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There is currently no definition for 'degraded' ecosystems in the UK nor assessment of the extent of these areas. Consequently, it is not possible to know whether or how this target will be met. The GBF guidance states that degraded land includes natural ecosystems which have a loss of ecosystem functions and services and transformed ecosystems (such as agricultural areas) and that an assessment of degraded areas within a country is a necessary first step for monitoring the total percentage of degraded ecosystems which are under restoration.

Lack of definition includes whether this target is limited to the restoration of delineated areas of habitat (for example protected areas, ELM Landscape Recovery areas) or whether it extends more broadly to the restoration of ecosystems within and across farmed,

productive and managed landscapes (for example, wildflower meadows, hedgerows and river catchments).

While the UK has now committed under the CBD to meet this target domestically, there are no specific commitments or policies in England for 30% of degraded areas under effective restoration. There are no plans to monitor and track progress against this target in England on land. There has been no assessment of degraded areas in England and no specific strategy to ensure degraded areas are under effective restoration.

The new Government has a mandate to improve natural habitats, committing in their manifesto to expand nature-rich habitats such as wetlands, peat bogs and forests.<sup>6</sup>

There has been very limited progress in designating further protected sites to ensure important habitats are under legal protection. The recommendations from the UK SPA Reviews from 2016 and from 2011, which found critical gaps in England's protected sites network for many of our most vulnerable bird species, have not been implemented. In November 2021 the Government stated that it has 'developed an England implementation plan in liaison with Natural England' for these reviews but this plan does not appear to have been published or implemented.

This target will be especially important in the face of climate change, which is one of the main drivers for loss and degradation of habitats.

Depending on how it is defined, there are several policies and commitments which could have implications for delivering this target, including: EIP commitments to get degraded protected sites into recovering condition on the way to favourable condition, LNRs which will identify local nature recovery opportunity areas, the Nature Recovery Network, Landscape Recovery component of ELM which will restore for nature large landscape areas, policy protections for ancient woodland (included degraded ancient woodlands), the England Peat Action Plan, and new protections for chalk streams under Levelling Up and Regeneration Act, and an announced new Defra chalk streams recovery pack.<sup>7</sup>

If including restoration within farmed landscapes, other policies become relevant, including the SFI and Countryside Stewardship tiers of ELM.

### *What is needed*

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- A definition and assessment of degraded land and inland water in England, and a strategy to ensure at least 30% of these areas are under effective restoration with routine monitoring and transparent reporting.
- Set a legal target to ensure 75% of protected sites are in good condition by 2042. Expansion of protected site status could protect additional freshwater sites, including all chalk streams.
- Ensure sufficient funding and ambition for the Landscape Recovery component of ELM.
- Strengthen policy protections for ancient woodland and consult on expanding the list of irreplaceable habitats.
- Implement the England Peat Action Plan, including by advancing the ban on horticultural peat (promised by 2024) and expanding the ban on heather burning on the uplands.
- Effective action to mitigate and adapt to climate change (see Target 8 for more detail).

## **Restoration: Marine**

### **Little progress**

### *Rationale*

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While currently there is no EIP commitment to ensure restoration is achieved across 30 percent of the sea scape, the Government has committed to conduct a review of EIP targets by the end of 2024. Any updates must include plans to track and monitor progress against this target in England and outlines measures for benthic habitats, birds and mobile species including cetaceans and seals. Natural England's English Seabird Conservation and Recovery Pathway (ESCaRP) is a step



towards delivering for seabird restoration, however, there are serious concerns regarding steps to deliver on identified commitments. Outside of ESCaRP, little work is being undertaken to ensure the protection and restoration of other mobile species including cetaceans. This is particularly concerning given the significant increase in underwater noise pollution expected from increased infrastructure over the coming years.

Last year, Defra designated the first three pilot Highly Protected Marine Areas (HMPA) sites but selection of further sites has stalled. While new site designation for MPAs as a compensatory measure for offshore wind offers some opportunity for benthic habitats and blue carbon stores, it merely maintains the marine environment at a degraded baseline rather than improving restoration opportunities.

An opportunity Defra has to significantly improve the marine environment is through Marine Net Gain. The Government published its consultation response to the principles of the policy last year, but no further outputs have been published. As one potential policy lever for investment in marine restoration projects the Government must act fast. At the same time, persistent licensing barriers to seascape plans for marine restoration projects must be removed.

Damaging fishing practices continue across the vast majority of the MPA network causing risk to its protection and restoration. Where fisheries management measures do exist they largely only cover a site's designated features rather than providing a whole site approach. Where fisheries management measures have been put in place there is little monitoring available to assess their effectiveness.

### ***What is needed***

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- Work with The Crown Estate to ensure robust environmental assessment of sites allocated for offshore renewables and site allocation is directed by the principles established in the Strategic Marine Planning Task Force and Delivery Roadmap for England.
  - Publish Stage Three and Stage Four Byelaws through the Marine Management Organisation
- (MMO) programme to ensure the MPA network is protected from the most damaging forms of fishing by the end of 2024. MPAs must be protected across the whole site.
- Ensure time-bounded and meaningful targets and objectives are set in the incoming Fisheries Management Plans (FMPs) and ensure all FMPs are delivering towards the same goals in the Fisheries Act (2020). Alongside, work to adjust catch limits downward to take into account fisheries activities outside the MPA network and, wherever possible, work in collaboration with the fishing industry to consider sustainable alternatives.
  - Conduct a SPA Sufficiency Review at sea to assess where the gaps remain in the MPA network so they can be addressed, and ensure the network of MPAs across English waters is ecologically coherent and truly supports species recovery.
  - The Government must place a time-bound commitment on its promise to deliver mandatory Remote Electronic Monitoring (REM), including expanding measures to all vessels of all sizes. This must include a strategy to eliminate all unwanted bycatch which persists as one of the biggest causes of death for seabirds, cetaceans, seals and poor fish spawning.
  - Design and implement a framework for Marine Net Gain which requires all developments to contribute to the restoration of our seas and work with The Crown Estate to agree a separate 'seabed lease for nature protection and recovery' projects so space is secured to discharge future MNG obligations.
  - Provide the resources required for the effective monitoring and management of the MPA network, prohibiting all damaging activities and properly funding enforcement agencies to deliver conservation goals.
  - Ensure local authorities are able to include extensions to the marine environment within Local Nature Recovery Strategies and ensure prohibitive licensing barriers to restoration projects are removed.

## Restoration: Freshwater

### Little progress

#### Rationale

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Analysis from the Office for Environmental Protection (published in May 2024) has confirmed that the Government is not on track to meet the 2027 deadline to bring the majority of waters to Good Status under the Water Framework Directive (WFD) Regulations, with just 21% surface waters expected to achieve 'Good' by 2027. The OEP confirmed in their assessment that these failures are due to poor implementation of the Regulations.<sup>8</sup>

The repercussions of this failure to achieve WFD targets remain unclear in policy terms. Despite commitments made in 2023 under the Plan for Water to review WFD, the Government has yet to indicate how WFD will be evolved post-2027, or what steps will be taken pre-2027 to improve implementation.

Concern regarding what will happen post-2027 is further exacerbated by the lack of an apex water target under the Environment Act, insufficiently ambitious water targets under the Act which still lack supporting evidence for how they will be met and the environmental outcomes they will deliver, and a similar lack of clear detail regarding interim targets with the Environmental Improvement Plan (EIP).

Policies and commitments in the water space continue to be undermined by the lack of agency/regulator funding and capacity to fully monitor, enforce and advise on legislation. For example, 43% of river catchments had no water quality samples taken by the Environment Agency at all in 2023.<sup>9</sup> The extension of the Growth Duty to Ofwat (May 2024) will further undermine its ability to robustly regulate the water industry, and uphold high environmental standards. We cannot say the policy building bricks are in place if we do not have evidence that they will be fully implemented and enforced.

Water industry business plans have now been published for 2025-2030, plus Ofwat's draft

determination to approve this spending package. This record £88bn investment includes the largest ever Water Industry National Environment Programme (WINEP) spend, including substantial pots of funding to improve Storm Overflows and address nutrient pollution in line with legislation. However, it remains unclear from the plans themselves or from Ofwat's draft determination what contribution this 2025-2030 funding will make in terms of outcomes, and therefore progress towards environmental targets. Just £2bn of the investment is for catchment and nature-based solutions, which means opportunities to maximise environmental outcomes through multi-benefit, low carbon approaches are being missed.<sup>10</sup> Furthermore, Government steer to water companies in 2023 to phase non-statutory environmental activities to post-2030 (in order to reduce impact on customer bills) means that environmental ambition has been capped.

A Water (Special Measures) Bill has been confirmed in the 2024 King's Speech, which will focus on regulation of the water industry and tougher penalties for non-compliance. A second piece of water legislation has also been hinted at, but the focus and likely content of this Bill is as yet uncertain. This new legislation has potential to support delivery of the GBF targets, but without further detail, the extent to which this is the case remains unclear.

#### What is needed:

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- Adoption of the recommendations of the Office for Environmental Protection to improve implementation of WFD pre-2027 - including:
  - Ensuring that measures within River Basin Management Plans are specific, timebound, and adequately funded to deliver their objectives.
  - Developing and implementing a coherent monitoring and evaluation framework for the state of the water environment.
  - Extending reach and funding of the Catchment-Based Approach (CaBA) partnerships.
- Introduction of a strong new Green Duty for public bodies including Ofwat. This would ensure that

decisions are made with regard to how investment will deliver the best environmental outcomes, facilitating delivery of low carbon, multi-benefit infrastructure by default.

- Increased funding and resources for regulators to monitor the state of waters, and to enforce legislation.
- Commitment to not watering down the WFD, through reducing environmental ambition or through making this process less accountable (e.g. stripping out 'one out, all out'). Instead, Government should work to strengthen WFD Regs (e.g. through inclusion of smaller water bodies).<sup>11</sup>
- Introduction of an apex water target under the Environment Act and clear delivery plans to ensure the four existing water targets can be met.



## 3. CONSERVATION 30X30

Ensure and enable that by 2030 at least 30 % of terrestrial and inland water areas, and of marine and coastal areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation measures, recognizing indigenous and traditional territories, where applicable, and integrated into wider landscapes, seascapes and the ocean, while ensuring that any sustainable use, where appropriate in such areas, is fully consistent with conservation outcomes, recognizing and respecting the rights of indigenous peoples and local communities, including over their traditional territories.

### 30x30: Land

#### Little progress

#### *Rationale*

The Government has published its draft criteria and indicative 30x30 map on land in England and recently reiterated its commitment to achieving this pledge in England, including in its publication of national contributions towards GBF targets.<sup>12</sup> It has also begun consulting with stakeholders on guidance to finalise and apply the 30x30 criteria on land in England.

We welcome the Government publishing its roadmap to protecting at least 30% of land in England. However, the target is only meaningful if it comes with a plan and significant increase in public funding and regulation to restore the two thirds of protected

sites that are not in good condition. Realistic plans for restoring those sites to good ecological condition would be needed to ensure that the Government's current figure of 8.5% represents real benefits for nature.

Link's most recent analysis shows that currently only 2.93% of land in England is effectively protected and managed for nature and could count towards this 30% target, only taking into account the condition of habitats in protected sites.<sup>13</sup> While the Government has set out interim targets on the condition of protected sites, delivering this improvement will require a major increase in public funding and improved regulation.

Beyond protected sites, there has been no formal assessment of the potential for areas of land within protected landscapes not already designated as protected sites to contribute to 30x30. While many individual protected landscapes are considering the nature opportunities in their area, there has been no national comprehensive assessment yet. No Other Effective area-based Conservation Measures (OECMs) have been assessed and recognised or reported on land in England.

The Government has also not addressed connectivity in its policy so far on 30x30. Connectivity between suitable habitats is an essential part of the 30x30 pledge to create a functional and resilient ecological network, allowing the movement of species, especially in response to climate change. Connectivity should be considered when designating new protected areas to expand the protected sites network and to deliver 30x30.

### What is needed

- Publish a delivery plan to deliver 30x30 in line with international standards and an assessment process to evaluate and report on progress towards 30x30.
- Improve and significantly expand the protected sites network on land, with large-scale capital and maintenance investment to improve the condition of the Sites of Special Scientific Interest (SSSI) network, of which only 38% is currently in good condition.
- Support protected landscapes' ability to contribute to

30x30 through strengthened Management Plans and Nature Recovery Plans for nature, including through a requirement for a local target for contributing to the national 30% target and a map and plan to achieve this target, alongside significantly increased funding.

- Consult on and publish criteria for potential OECMs based on IUCN international guidance for case-by-case assessment of individual potential OECMs to demonstrate long-term protection, management for nature, and good biodiversity outcomes, in order to count towards 30x30.

## 30x30: Marine

### Some progress

#### Rationale

Currently, a maximum of 9.97% of English seas could be said to be protected for nature against the most damaging forms of fishing activity, one of the primary drivers of marine biodiversity loss.<sup>14</sup>

Over the past year, three relatively small sites have been designated as Highly Protected Marine Areas (HMPAs) Allonby Bay, Dolphin Head, and North East of Farnes Deep. They cover just 0.42% of English waters. Just over 17 offshore designated features in Marine Protected Areas (MPAs) have received protection from the damaging effects of bottom towed fishing gear, with commitments to implement further two stages of fisheries management measures across the MPA network by the end of 2024. This would be a positive step, but time is running out.

Many of the legislation and policy commitments required to achieve 30x30 at sea are in place, however existing protections must not be undermined by the expansion of offshore wind, the fishing industry and lack of ambition to finance seascape nature recovery. The speed of new management measures and strengthening measures undertaken as part of environmental assessments, e.g., compensation, must be significantly ramped up over the coming years to deliver for nature at sea.

## What is needed

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- Establish a Strategic Marine Planning Task Force and Delivery Roadmap for England by the end of 2025. This will inform decisions on the policy priorities required to optimise management of the sea space and must; (a) prioritise sea space for a connected network of nature protection, recovery and enhancement in accordance with Environment Act targets, (b) allocate seaspace for offshore energy production in accordance with (a), (c) develop a detailed and properly funded just transition strategy for activities displaced by (a) & (b), (d) ensure that (a) to (c) in combination achieve Good Environmental Status (GES).
- As on land, the Government must publish a criteria which states what counts towards 30x30, including the definition of 'effective management measures.'
- Conduct a Special Protection Area (SPA) Sufficiency Review at sea to assess where the gaps remain in the MPA network so they can be addressed, and ensure the network of MPAs across English waters is ecologically coherent and truly supports species recovery. The last UK SPA Review published by JNCC highlights that 'review of SPA provision in the marine environment is needed for at least 49 species'. This is particularly urgent given the continued failure to achieve GES for seabird populations and the catastrophic impacts of avian flu.
- Expand the existing MPA network to include important blue carbon habitats. This will remove pressure on existing carbon stores and ensure the network can contribute to meeting biodiversity and climate needs.
- Publish byelaws for the three designated HPMAs and urgently designate additional HPMAs as outlined in the Benyon Review.



# 4. SPECIES EXTINCTION

Ensure urgent management actions to halt human induced extinction of known threatened species and for the recovery and conservation of species, in particular threatened species, to significantly reduce extinction risk, as well as to maintain and restore the genetic diversity within and between populations of native, wild and domesticated species to maintain their adaptive potential, including through in situ and ex situ conservation and sustainable management practices, and effectively manage human-wildlife interactions to minimize human-wildlife conflict for coexistence.

## Little progress

### Rationale

The Government has set legally binding targets to halt and reverse the decline of species abundance in England by 2030 and 2042 respectively and to improve the GB Red List Index for species extinction by 2040 (compared to 2022 levels).

The Environment Act also legislated for the Environmental Improvement Plan (EIP), intended as a programme of interim targets and policy interventions to serve as a delivery vehicle for meeting the Environment Act targets. Currently, while the EIP includes some species-specific interventions to help achieve these targets, including a one-off £25 million Species Survival Fund, implementing Species Conservation Strategies introduced by the Environment Act 2021, before continuing the Species Recovery Programme, these policies, actions and funding are not sufficient to achieve the species targets. There is likely to be a major shortfall on delivery. The OEP has concluded that 'progress on delivery of the 25YEP has fallen far short of what

is needed to meet the Government's ambition to leave the environment in a better state for future generations'. The OEP also pointed out that it is not clear if and how the policies and commitments in the EIP will add up to meet the species targets.<sup>15</sup> We welcome the new Government's announcement of a rapid review of the EIP to deliver the Environment Act targets, including the species targets.<sup>16</sup>

The farming transition towards Environmental Land Management (ELM) schemes will be key to delivery of the species abundance target, but it is likely to fall short on regulation and enforcement, due to the loss of cross-compliance, and on incentives, due to the watering down of ambition and funding for the Sustainable Farming Incentive (SFI). While there are some actions available within ELM schemes for in situ livestock conservation, they are not available for all breeds on all habitats and the Government also does not fund livestock genebanking needed for ex situ livestock conservation. The new Government has promised in their manifesto to 'make environmental land management schemes work for farmers and nature.'

Climate change is one of the main drivers of species and biodiversity loss. However, the Government is not taking sufficient action to tackle climate change - the Committee on Climate Change (CCC) has concluded that the Government is not currently on track to meet its own UK climate mitigation targets.<sup>17</sup> The Government's National Adaptation Plan is also inadequate for nature protection and restoration.

We welcome the introduction of Species Conservation Strategies, but there must be clear and effective measures to halt declines and drive recovery at the pace and scale needed and with improved coordination and integration of existing mechanisms for species to maximise impact. Species have also not been sufficiently embedded into other existing environmental policies, such as the design and funding of (ELM) schemes, Local Nature Recovery Strategies (LNRSs), Biodiversity Net Gain (BNG), and other policies such as land use planning and development.

Lastly, species-specific support and funding will be needed, in particular for the most threatened species, and for species not currently meeting Favourable Conservation Status (FCS) ideally before they reach the fragile status of 'threatened'. The Government has a Threatened Species Recovery Actions project which is identifying priority actions for the recovery of our most threatened species. However, there is no long-term funding currently available to support the implementation of these actions or a wider ambitious species recovery programme. In some areas there are already policies and plans in place, for example for Atlantic salmon stocks, but the actions and their implementation are not robust enough or quick enough to achieve change.

### *What is needed*

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- Publish a strategic and costed plan and the necessary increased investment to deliver and monitor progress towards the species abundance targets, including targeted species recovery, including for the priority actions set out in the Threatened Species Recovery Actions project.
- Increase the investment in ELM schemes and improve the design to meet the scale of need, for species. The refreshed EIP should set out what contribution ELM schemes will be expected to make to recovering species against cohesive delivery timescales and what design, spatial prioritisation, and levels of funding will be required to deliver results on the ground.
- Improve the comprehensiveness and quality of species monitoring on land, waterbodies, and at sea in England, especially of underrepresented taxa, including significantly increased resources, support of citizen science projects, encouragement of sharing of data by developers who have conducted detailed site surveys, and the right skills and expertise in Natural England, the Environment Agency, and JNCC.
- Maintain, and improve implementation of, legal protection for all protected species, with any impacts on local populations and wider meta-populations avoided in the first instance or mitigated by robust, scientifically-proven beneficial measures.
- Revisit the recommendations of the EFRA report on species reintroduction, published in July 2023 but rejected by the Government in October 2023, and implement its proposed measures to establish a species reintroduction strategy to set priorities, manage risk and support landowners and communities to use scientifically driven reintroduction as a tool to advance species recovery.
- Revisit the recommendations of the JNCC Quinquennial Review and the EFRA Inquiry Marine Mammal Report and prioritise actioning the report recommendations as soon as possible.
- Mandate nature-friendly design in all new housing and infrastructure development, requiring suitably designed and located swift bricks, bat boxes and bee bricks where appropriate, as well as wildlife tunnels, green and brown roofs on flat spaces where these measures are appropriate..
- Deliver the English Seabird Conservation and Recovery Pathway (ESCaRP), which is delayed at least a year in its delivery. The current results of the seabird census indicate a 50% decline in seabirds across the UK, creating a more urgent need to deliver upon this strategy.
- Increase the invasive species biosecurity budget to £3 million and provide a further £3 million to fund a permanent dedicated Invasive Species Inspectorate, on par with other biosecurity Inspectorates.
- Set fishing opportunities in line with scientific advice from the International Council for the Exploration of the Sea (ICES), to conserve fragile wild fish populations, ensure sufficient biomass is available for marine predators like cetaceans and seabirds, and effectively resource and implement a plan to tackle bycatch of sensitive species, including the introduction of Remote Electronic Monitoring (REM) with cameras onboard all vessels operating within the Exclusive Economic Zone.
- Take effective action to mitigate and adapt to climate change (see Target 8 for more detail).

# 5. WILDLIFE TRADE

Ensure that the use, harvesting and trade of wild species is sustainable, safe and legal, preventing overexploitation, minimizing impacts on non-target species and ecosystems, and reducing the risk of pathogen spillover, applying the ecosystem approach, while respecting and protecting customary sustainable use by indigenous peoples and local communities.

## Some progress

### Rationale

The new Government's manifesto promises included a commitment to 'protect wildlife' and 'work in partnership with civil society, communities and business to restore and protect our natural world'.

In order to fulfil these broad commitments, the Government will need to take action to address current unsustainable wild species harvesting practices in the UK.

The Government has the opportunity to act quickly to end a deeply unsustainable practice, the shooting of game with lead ammunition, a practice which spreads toxic lead through the countryside and into the food chains of a number of wild bird species. 50,000-100,000 wildfowl in the UK (c. 1.5-3.0% of the wintering population) are now estimated to die unnecessarily as a direct result of lead poisoning, from pollution caused by lead ammunition use in game shooting. An official report recommending a ban is due to be presented to Ministers by UK REACH in autumn 2024 and they should agree to swiftly implement a widespread ban, covering both lead shot and lead bullets.<sup>18</sup>

A number of further unsustainable practices were allowed to flourish under the previous Government. **The new administration should explore action to address:**

- Heather and grass burning by game shooters, to create good conditions for producing short term surges in the number of young grouse (thereby increasing stocks for shooting). This burning devastates ecosystems and releases carbon and should be banned, except where a strong ecological case can be made for the practice.
- Unsustainable large-scale fishing. Analysis by CEFAS has shown that, since 2020, only 34-35% of baseline Total Allowable Catches in the UK have been at a level consistent with Maximum Sustainable Yield advice from the International Council for the Exploration of the Sea.<sup>19</sup> A recent study by Hull University for the IUCN found that species of fish are at risk of extinction in Britain's waters, including the iconic Atlantic salmon.<sup>20</sup> The majority of this unsustainable fishing in UK waters is carried out by large international fishing companies.
- The legal shooting of brown hares, a species of conservation concern, all year round. This leads to a double blow to hare populations, with losses from animals killed directly being matched by the consequent mortality amongst infant hares (leverets) orphaned in the breeding season.
- Stop the culling of badgers, and tighten all Wildlife Licensing rules.

### What is needed

- A ban on the use of both lead shot and lead bullets in hunting, to be announced in autumn 2024 and implemented by the end of 2025.
- A ban on the transit of cetacean products through UK ports and the trade of all seal products

### The Government should also consider:

- Banning the practice of heather and grass burning as part of game bird breeding.
- Reducing Total Allowable Catches to sustainable levels
- Preparing action plans to promote sustainable small scale fishing over large scale operations.
- Introducing a time limited shooting season for brown hares, to prevent shooting in the breeding season, ensuring ongoing sustainable harvesting of this wild species.



- Boosting efforts to combat the international illegal trade in wildlife by making wildlife crime offences (including trafficking) fully recordable by the Home Office, enabling the collection of more nationwide data to inform and improve policing.
- Make some key wildlife crimes notifiable.

## 6. INVASIVE SPECIES

Eliminate, minimise, reduce and or mitigate the impacts of invasive alien species on biodiversity and ecosystem services by identifying and managing pathways of the introduction of alien species, preventing the introduction and establishment of priority invasive alien species, reducing the rates of introduction and establishment of other known or potential invasive alien species by at least 50 per cent by 2030, and eradicating or controlling invasive alien species, especially in priority sites, such as islands.

### Little progress

#### Rationale

Existing policies and their implementation have been insufficient in preventing the establishment of Invasive Non-Native Species (INNS).. There are limits to what can be achieved with the current scale of action, notably due to low resources and subsequent lack of implementation of existing policies. Listing/ delisting of species under INNS legislation is slow and is failing to keep pace with the EU following Brexit. There is need to address this to ensure species list better reflect the threat they pose to GB. The Government must also proactively manage the species that are already listed, starting with publishing the implementation plans to do so.

The Non-Native Species Inspectorate (NNSI) trial began in 2021 with just 4 staff members but has

grown to 'full capacity' of 17 staff members.<sup>21</sup> This is encouraging growth but is still under-resourced considering the scale of the threat of INNS. More funding and staff capacity will allow for increased proactive inspections.

It is likely that the Inspectorate will remain a permanent resource, however there has been no public confirmation of this extending beyond the 3 year trial. They have had good results with a total of 1,378 inspections in 2023 to 2024, finding a non-compliance rate with respect to key invasive species legislation across all key sectors to be 11%, and identifying that potentially over 300,000 contaminated units (containers, recreational boats and angling equipment) arrive in GB annually. The NNSI has eradicated (subject to monitoring) two invasive species - Sea Myrtle and the Acrobat Ant.

The Secretariat are committed to a hierarchical prioritising prevention, early detection and rapid response, followed by control. However this is undermined by the slow progress on a number of INNS components. The delivery of the GB INNS Strategy is dependent on the Implementation Plan and Pathway Action Plans that are still not published for consultation, and have both been repeatedly delayed for years. Likewise, there has been slow progress in Parliament to lay the Statutory Instruments to de-list and list species of special concern to target the greatest risk species.

The Inspectorate still do not have the powers in place to conduct inspections at GB borders and are limited to post-border checks only.

#### What is needed

- Reform the process of listing GB Invasive Species of Special Concern by speeding the process up to rapidly respond to new threats.
- Create a publicly available evidence base for all identified and potential INNS.
- Secure the NNS Inspectorate permanently, beyond the 3-year trial, supported with more funding, on par with the other biosecurity inspectorates, and new powers to inspect at the border.
- Publish the Non-Native Species Strategy Implementation Plan.

# 7. POLLUTION

Reduce pollution risks and the negative impact of pollution from all sources by 2030, to levels that are not harmful to biodiversity and ecosystem functions and services, considering cumulative effects, including: (a) by reducing excess nutrients lost to the environment by at least half, including through more efficient nutrient cycling and use; (b) by reducing the overall risk from pesticides and highly hazardous chemicals by at least half, including through integrated pest management, based on science, taking into account food security and livelihoods; and (c) by preventing, reducing, and working towards eliminating plastic pollution.

## Pollution: Excess nutrients

### Little progress

#### *Rationale*

The UK Government is not doing enough on reducing excess nutrients and the pollution that emanates from those nutrients that are lost to the environment. The poor management of nitrogen oxides, nitrates, ammonia and phosphorus means that they remain at damaging levels for biodiversity and public health, and nitrous oxide emissions from fossil fuels and fertiliser manufacturing and application remains a further urgent problem due to its contribution to climate change. There are not sufficient policy building blocks for addressing these issues at the holistic scale or pace required. Too much flexibility on timescales to manage limits (i.e., closed periods/lower application levels) and the restriction of chemicals creates further risks for biodiversity.

The build up of these nutrients and pollutants in the environment is a direct threat to English biodiversity. However, the existing regulatory frameworks require significant and rapid improvements - with certain policies either going backwards or requiring urgent

updating. The Government has set 2030 voluntary reduction targets for ammonia emissions, which amounts to a 16% reduction over 25 years, falling significantly short of the scale of reduction required by Target 7. None of the ammonia commitments in the 2019 Clean Air Strategy have been delivered. Regulations on ammonia and slurry nutrient management regulations have not yet come to fruition, and uncertainty remains as to their delivery after delays to updates and Government co-design sessions with stakeholders.

The Environment Act requires the Government to address river pollution and air quality, but its air quality targets only cover PM2.5 and do not include other pollutants, and achieving the agricultural water pollution target requires monumental shifts in compliance along with significant improvements in nutrient and soil management, for which there is no delivery plan. Synthetic fertilisers are also poorly regulated in the current legal and policy framework as the ELM schemes do not incentivise the transition to less harmful alternatives, and the Government is yet to publish a strategy for reducing reliance on manufactured nitrogen and phosphorus fertilisers. Regulatory and policy clarity is needed on these issues, as well as directive and support regarding the infrastructure needed to store waste to manage the application of less harmful alternatives, to sufficiently redirect reliance away from synthetic fertilisers.

The EIP 2023 includes an interim target to reduce nitrogen, phosphorus and sediment pollution from agriculture into the water environment by 10% by 2028 compared to the 2018 baseline, towards the Environment Act target of 40% by 2038. While a legally-binding target is welcome, the level of ambition is low, still allowing significant amounts of pollution to continue beyond 2038 - the Government should strengthen the target and back it up with enforcement and incentives needed to achieve the target. The Farming Rules for Water remain poorly enforced and have not prevented pollution from agricultural run-off containing synthetic fertilisers and chemicals from other farming techniques such as manure, slurry, agricultural plastics and biosolids - which is a direct threat to biodiversity in watercourses.<sup>22</sup>

The new Government has pledged to find ways to build new homes in catchment areas affected by nutrient neutrality rules (designed to uphold Habitats Regulations protections) without breaching those rules. This is viable; strategic solutions to mitigate nutrient pollution are already in place, and if supercharged, can ensure environmental limits are not breached under the Habitats Regulations requirements, while allowing new housing to go ahead. The Government must embrace these solutions and uphold their promise.

There are also gaps in terms of preventing pollution from intensive livestock units - farms are only required to apply for a bespoke permit above a certain number of places for poultry and pigs and there are no rules for cattle or on stocking density.<sup>23</sup> The Government is yet to deliver on its commitments in the EIP to introduce rules on cattle permitting. Additionally, farms apply organic waste and other nutrient polluting activities outside the Habitats Regulations and nutrient neutrality zones, meaning there is limited ability to control the nutrient pollution that emanates from intensive livestock units and other developments which are outside of these areas.

### **What is needed:**

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- An integrated, whole systems approach to nitrogen, phosphorus and other nutrient pollution across all relevant government departments.
- General regulatory requirements (a regulatory baseline) requiring all farms to reduce nutrient pollution. Reductions could be achieved through catchment-level nitrogen budgets, implemented through farm-level nitrogen budgets - all nested within a national nitrogen budget. Other regulations, such as closing gaps in permitting rules and delivering on commitments in the EIP for rules on cattle permitting will also have a positive impact on reducing nutrient pollution.
- Scaled up ambition for national statutory targets (i.e. within the EIP and the Clean Air Strategy) in line with halving nitrogen and phosphorus pollution by 2030.

## **Pollution: Pesticides & hazardous chemicals**

### **Progress reversed**

#### **Rationale**

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Following Brexit, the UK has established an independent chemicals and pesticides regulatory regime. However, there have been significant rollbacks in chemicals regulation compared with the former regime under EU Registration, Evaluation, Authorisation and restriction of Chemicals (REACH) and related pesticides regulations.

On hazardous chemicals: The UK Chemicals Strategy has been repeatedly delayed, and although the Government has continued to promise delivery in 2024, it is unclear when this will happen.

The UK is initiating fewer and weaker protections for health and the environment compared with the EU. Its policy of divergence and establishing a standalone system separate from EU REACH means that there are significant risks to biodiversity, and the UK is falling behind its EU counterpart. In the 3 years since the UK left the EU system, it has not adopted a single restriction on a harmful substance (other than on Perfluorohexane sulfonate (PFHxS), a sub-set of per and polyfluoroalkyl substances (PFAS)), following its ban internationally under the Stockholm Treaty), compared with nine new restrictions adopted at EU level, including some highly significant and consequential ones such as on microplastics that are intentionally added to products. The two that have been initiated since Brexit under UK REACH was established, over three years ago, are still ongoing and are generally less protective than the EU counterparts.

Many of the regulatory priorities identified in the 2022-23 and substantially delayed 2023-24 (released in February 2024) work programmes, have not come to full fruition. The strongest example is PFAS, despite substantial, publicly available evidence proving these chemicals to be hazardous to humans and nature. The Regulatory Management Option Analysis on the forever chemicals, PFAS, recommends PFAS

restrictions under UK REACH which is welcome, but the range of PFAS is narrow and covers a limited number of uses and progress has been slow. Presently, the only coherent consideration of a PFAS restriction in the current work programme relates to PFAS in firefighting foams, though a restriction itself is still yet to emerge.<sup>24</sup> This means that the UK is increasingly lagging behind while the EU and other countries such as the US plough ahead with restrictions in food packaging, drinking water limits and textiles, all of which will have protective implications for biodiversity.

The recent UK REACH Alternative Transitional Registrational model (ATRm) plans indicate that the Government plans to reduce the hazard information that chemicals companies must provide to register substances in the UK and safety information to an irreducible minimum. The ATRm proposals suggest an overall weakening of chemical safety data requirements, which will place human and environmental health at risk.<sup>25</sup> The proposal also places unnecessary costs and burdens an already slow, ineffective UK REACH system. Together, these risks far outweigh these limited benefits.

The much delayed National Action Plan on the Sustainable Use of Pesticides has yet to be released. Neonicotinoids have been progressively restricted in the UK, with a near complete ban on three of the most toxic ones entering into force in 2018. However, against the advice of the Expert Committee on Pesticides, the Government has also repeatedly granted emergency derogations of banned neonicotinoids for use on crops, which have proven impacts on bees, pollinators and wildflowers. Another emergency derogation on toxic neonicotinoid “Cruiser SB” was granted in 2024. A small positive is that there are Integrated Pest Management options in place under ELM (SFI), however these may be limited in efficacy by the lack of a joined up whole farm approach or access to good quality advice.

Some pesticides and neonics are still used in veterinary medicines and by local authorities to control weeds in urban areas, which are not appropriately regulated. Like agricultural pesticides, these pesticides form part of chemical cocktails polluting watercourses and environments due to direct contamination and run-off.

### ***What is needed:***

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- Release of an ambitious UK Chemicals Strategy and a credible National Action Plan for the Sustainable Use of Pesticides, integrating the precautionary principle and a grouping approach in chemicals policy, where chemicals with similar structures are regulated together to avoid regrettable substitution.
- A stable, EU alignment-based model to address the above problems and close the protective divide that is opening with EU REACH, which risks becoming a chasm.
- A comprehensive PFAS Action Plan to protect people and nature.
- Binding pesticide reduction targets, to reduce the use and risk of chemical pesticides significantly by 2030, as well as ending emergency authorisations of banned pesticides and prohibiting the use of PFAS in pesticide formulations
- Ban insecticides that are already banned for crops from veterinary use.
- The use of pesticides should be banned in sensitive areas, including protected sites and in public areas.
- Development of PFAS and hazardous chemicals free alternatives and incentivize alternatives to toxic pesticides.
- Promote better systems and resourcing for monitoring and enforcement of chemical pollution in water, soil and air, including (for pesticides) an alert system integrated with Prioritisation and Early Warning System (PEWS) and (for pharmaceuticals) a work programme to incentivise coordinated action across the pharmaceutical, healthcare and environmental sectors to reduce contamination of wastewater and sewage.
- Improve pesticides approval tests and processes that protect all species from all ingredients in pesticides, as opposed to active ingredients only. Decision-making on new pesticides should be improved, with transparency and public consultation.

## Pollution: Plastic

### Some progress

#### Rationale

The Government's commitment to introducing a Circular Economy Roadmap to deliver its commitment to create a zero waste economy by 2050 is welcomed. This should set a new strategic direction for Defra, ensuring all policies relating to plastic are moved further up the waste hierarchy.

However, the Government has delayed its flagship Deposit Return Scheme (DRS) for the fourth time this year, allowing more than 9 billion drinks containers per year to be left ending up in landfill, incineration or as litter. It still remains unclear whether glass will be included in the scheme. Similarly, progress towards an Extended Producer Responsibility for packaging (pEPR) Scheme Administrator is slow. Without properly implementing these policies, thousands more plastic items will end up polluting our streets and seas. Defra has also failed to fully explore the possibility of litter payments for those producing the most commonly littered items on land.

Defra needs to use policy levers at its disposal to incentivise the removal of plastic products from the marketplace incentivising reuse and refill options. The Plastic Packaging Tax has done little to prompt a recycled plastic market in the UK, with many producers choosing to pay hefty fines rather than switch materials.

Across our oceans, marine plastic pollution is still rife. The Government has been a strong voice supporting the negotiation at INC-4 of the Global Plastics Treaty and should push for further ambition at the conclusion of the negotiations at the end of the year. It needs to push for a global consumption reduction target for plastics, resisting lobbying efforts from the petrochemical industry.

#### What is needed:

- An ambitious legally binding Global Plastics Treaty to end plastic pollution of all types, and push for upstream measures such as consumption reduction, reuse and refill.
- Introduce DRS, with glass, as soon as possible.
- The Government must reconsider litter payments for producers of the most commonly littered items as part of the pEPR Scheme.
- A comprehensive package of policies to support increased plastic reuse to prevent polluting materials occurring at the source.
- Publication of a consultation on EPR for Fishing Gear which outlines the UK commitment to match or exceed the measures outlined in the EU Single-Use Plastics (SUP) Directive. This must be accompanied by active support for the Global Ghost Gear Initiative.



# 8. CLIMATE

Minimize the impact of climate change and ocean acidification on biodiversity and increase its resilience through mitigation, adaptation, and disaster risk reduction actions, including through nature-based solution and/or ecosystem-based approaches, while minimizing negative and fostering positive impacts of climate action on biodiversity.

## Progress reversed

### Rationale

Whilst the UK has halved its emissions from 1990 to 2022, the CCC confirmed that only a third of UK emissions reductions required to meet the 2030 target are covered by credible plans. For the second time in two years, the High Court ruled in May 2024 that the government would have to redraft its Net Zero Strategy because its existing plan did not provide enough detail about how future targets could be met. Current plans appear piecemeal. For example, the government plans to make 80% of new car sales zero emission by 2030, but has delayed the ban on selling new petrol and diesel cars until 2035.

The new Government have been clear on licensing in their manifesto, that they will not issue new oil and gas licences for the North Sea.

Large investment is being placed into carbon capture. However, the technology remains under-researched, expensive, and only capable of removing a portion of emissions. Regardless, the previous Conservative Government opened a consultation on integrating greenhouse gas removals (GGRs) into the UK Emissions Trading Scheme, with priority of engineered GGRs over nature-based GGRs. This would have serious consequences for climate targets. The permanence of removals, reliability of accounting for carbon sequestration, and uncertainty around the future supply of removals, amongst other features,

threaten the integrity of ETS overall. As such, the risks outweigh any potential advantages of the proposal for the environment.

The Nature for Climate Fund (NCF) had positive results in tree planting with a 45% increase in woodland creation in 2023-24 compared with 2022-23, and more than double those achieved in 2021-22. However, the NCF is ending in March 2025. With the NCF, climate change mitigation actions such as tree planting will be diverted to Environmental Land Management (ELM) schemes. With no additional funding for ELM and prioritisation of funds towards treeplanting and other environmental improvements, it will make it difficult to scale these actions at the pace required for substantial change.

There are some points in the third National Adaptation Plan (NAP3) about reducing non-climate pressures on coastal and marine habitats which are potentially more positive in terms of resilience, and NAP3 is an improvement on previous NAPs. However, it is lacking the governance, funding and monitoring protocols to produce an adequate response to climate risks. For example, the new statutory target of 70% of designated features in MPA network to be in favourable condition by 2042 is far off and not ambitious enough. It is vital the new cross-government Climate Resilience Board can drive ambition and change.

### What is needed:

- Continue or develop an equivalent of the Nature for Climate Fund.
- Ensure all parts of government are involved and collectively responsible, and engaged with devolved nations, to ensure a coordinated and integrated response to climate change and biodiversity across the UK. The Climate Resilience Board (outlined in NAP3) should play a key role in ensuring this.
- Ensure resilience plays a core role in the Government's Land Use Framework.
- The Government must place its commitment to 'no new oil and gas licences' onto the statute book to ensure it is protected for generations to come and better enforce the existing oil and gas activities to tackle chronic spills.

# 9. SUSTAINABLE USE

Ensure that the management and use of wild species are sustainable, thereby providing social, economic and environmental benefits for people, especially those in vulnerable situations and those most dependent on biodiversity, including through sustainable biodiversity-based activities, products and services that enhance biodiversity, and protecting and encouraging customary sustainable use by indigenous peoples and local communities.

## Some progress

### Rationale

Previous UK Governments have failed to manage wild species in a way that ensures they will provide benefits to people in the long term. The 2023 State of Nature report provided an authoritative stocktake on the state of UK wildlife, drawn from extensive biological monitoring. It shows a long-term decline in the average abundance of terrestrial and freshwater species of 19% since 1970, with a short-term decline of 3% between 2010 and 2020.<sup>26</sup>

The new Government has been elected with a mandate to turn these declines around, to benefit of both nature and people. The Labour Party manifesto promised to: 'expand nature-rich habitats such as wetlands, peat bogs and forests so families can explore and wildlife can thrive, including on public land.'

This promise can be delivered by setting out new funding (from both public and private sector sources) to enable the restoration of nature-rich habitats, and to allocate more land owned by the public sector for nature restoration and public access. Link has proposed a 'Public Nature Estate' to direct more public sector land to sustainable uses, including nature recovery and the facilitation of public access to and enjoyment of nature.

Sustainable use of the sea space is a challenge. With many priorities and limited space it is essential that nature recovery is embedded within every policy decision and spatial plan. We are calling for the Government to establish a Strategic Marine Planning Task Force and Delivery Roadmap for England by the end of 2025. This will inform decisions on the policy priorities required to optimise management of the sea space and must; (a) prioritise sea space for a connected network of nature protection, recovery and enhancement in accordance with Environment Act targets, (b) allocate seaspace for offshore energy production in accordance with (a), (c) develop a detailed and properly funded just transition strategy for activities displaced by (a) & (b), (d) ensure that (a) to (c) in combination achieve Good Environmental Status.

### What is needed:

- The creation of a Public Nature Estate to boost the amount of land dedicated to sustainable uses.
- A new system of marine spatial planning and prioritisation at sea, to manage conflicts emerging from the growing number of marine activities. This spatial planning and prioritisation system should ensure that fishing displacement from protected sites does not result in unsustainable pressures on other sensitive species or habitats.



# 10. SUSTAINABLE AGRICULTURE, AQUACULTURE, FISHERIES & FORESTRY

Ensure that areas under agriculture, aquaculture, fisheries and forestry are managed sustainably, in particular through the sustainable use of biodiversity, including through a substantial increase of the application of biodiversity friendly practices, such as sustainable intensification, agroecological and other innovative approaches, contributing to the resilience and long-term efficiency and productivity of these production systems, and to food security, conserving and restoring biodiversity and maintaining nature's contributions to people, including ecosystem functions and services.

## Sustainability: Agriculture

### Little progress

#### Rationale

Agriculture and associated land use change for farming has been a key driver of biodiversity loss in England, as successive State of Nature reports have shown. The UK Government has been progressively rolling out significant agricultural changes following Brexit and the exit from the EU Common Agricultural Policy.

The enabling legal framework of the Agriculture Act 2020 and the ambitions set out in the Environment Act 2021, 25 Year Environment Plan, Health & Harmony paper, and the Environmental Improvement Plan 2023, have set a framework to make agriculture

more sustainable, benefiting on-farm biodiversity. The Agricultural Transition Plan is in place and sets out a series of actions to achieve the Government's goal of having around 70% of farmers in the Environmental Land Management (ELM) Schemes by 2028. The Environmental Improvement Plan also commits to a target of 65-80% of land managers and farmers to adopt nature friendly farming on at least 10-15% of their land by 2030. However, the different policies are not well integrated and are not ambitious or resourced enough to meet these commitments.

Despite updates to the Agricultural Transition Plan, Defra has still yet to confirm the final ELM offer, consequently it is not yet possible to determine whether it will be sufficient to support the long-term delivery of the GBF targets. Payment rates under Sustainable Farming Incentive (SFI), while now healthier, still do not reflect many of the outcomes that need to be delivered for nature and people and much more can be done to ensure high-quality design and implementation for specific actions like public access and nature-based solutions.<sup>27</sup>

Ultimately, there are still too many "pick and mix", low-ambition elements of SFI and constraints with access and entry to Countryside Stewardship Higher Tier and Landscape Recovery. These higher tier schemes will deliver the most for biodiversity and are crucial for meeting statutory targets and represent better value for money for the taxpayer. Hence, poor access to these schemes, alongside the high demand for and skew in funding towards SFI risks further crowding out funding and presents a threat to nature.<sup>28</sup> Additionally, the lack of appropriate investment, and absence of, accessible, free advice and training for whole farm and agroecological approaches means that the ELM schemes as a whole are a missed opportunity for nature.

Progress has been made to close gaps in hedgerows regulations, but these regulations could be more ambitious.<sup>29</sup> Much needed regulations on nutrient management (including slurry) and the protection of vital natural assets such as soils, air and water are missing, or are not ambitious enough. Enforcement of existing farm regulations is poor, with high levels of non compliance.



Peatlands are sensitive locations for highly specialised habitats and species. The Government is actively promoting the use of lowland peatland for sustainable farming via the Paludiculture Exploration Fund. Work also continues on the Peatland Code. The overdue promise to ban horticultural peat is yet to be honoured. Similarly, policy on farming in floodplains, and maintaining drained channels to allow this, requires review to improve flood mitigation and storage and protect nature.

The Government has released its Food Strategy. Although sections 1.1 and 1.2 outline food security and sustainable production, the strategy does not integrate the full recommendations of the National Food Plan and largely focuses on security and productivity as opposed to agroecological approaches.

### *What is needed*

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- The UK Government is right to move to a “public money for public goods” approach but needs to go much further to invest in and enable innovative, biodiversity friendly practices, including integrating guided choice and spatial targeting of SFI actions and unlocking access to, and appropriately investing in, the high-ambition tiers of ELM such as Countryside Stewardship Higher Tier and Landscape Recovery.
  - ELM must be joined up with the Environment Act and other statutory targets, as well as LNRs, in an effective way, with other metrics of success (beyond uptake) becoming delivery focal points (e.g., landscape recovery, wildlife habitat in 10% of farmed area). A strategic, long-term plan linking ELM to statutory targets and setting out what contributions each scheme needs to make would support this process.
  - Proper funding is required to shift production techniques away from intensive models towards agroecological approaches.
  - The Government also needs to fund free (or affordable at cost), high-quality independent advice and facilitation.
- The regulatory baseline (which is uncertain following the loss of cross compliance and riddled with gaps) needs to be supported by funding for strong regulators and regulations must be better connected to the standards outlined in SFI and injected with ambition to prevent uncertainty and harm to biodiversity.

## Sustainability: Aquaculture & fisheries

### Little progress

#### *Rationale*

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To significantly reduce the impact of commercial fisheries on the marine environment, the Government must adopt an ecosystem-based approach to fisheries management by setting UK catch limits in line with advice produced by the International Council for the Exploration of the Seas (ICES), adjusting limits downward to account for areas where fishing is no longer permitted and ensuring sufficient prey is available for marine predators like seabirds and cetaceans. It must deliver the objectives of the Fisheries Act 2020 and the Joint Fisheries Statement (JFS), to minimise and, where possible, eliminate bycatch of sensitive marine species, and achieve fully documented fisheries; but progress is slow. Continued Government delays in progressing measures to address by-catch through implementation of a plan of action and requiring the use of Remote Electronic Monitoring (REM) and mitigation measures, significantly limit progress. Aquaculture managers need to have a strong focus on preventing any escape of farmed salmon from pens and/or consider using sterile salmon within their operations. They should reduce the mortality of wild fish caused by salmon lice and pathogens by implementing stricter disease and parasite control programs. This should be supported by rigorous monitoring and reporting to agencies concerning the prevalence of escapes and disease outbreaks

While we welcome the Government’s long-awaited response to the REM consultation in English waters, suggested next steps do not go far enough and ‘mandatory measures’ across all taxa appear to have

no implementation deadline. The blanket exclusion of REM on the under 10m fleet, which accounts for approximately 80% of English fishing vessels, and was supported by most respondents, means the policy is far less comprehensive than necessary to achieve its intended results. Moreover, the under 10m fleet comprises over 95% of the UK gillnetting fleet. Given the high wildlife bycatch risk (cetaceans, pinnipeds, elasmobranchs and seabirds) associated with fixed nets, the decision to not apply REM to under 10m vessels will prevent the Government from achieving this target.

Most stocks with UK interest remain overfished, beyond the science advice provided for sustainable limits from ICES. While there is some progress on the development of the Fisheries Management Plan (FMPs), currently only five out of the 43 FMPs have been published. There are shortcomings in the published FMPs including crab & lobster, bass, whelk, king scallop and the Channel non-quota species that targets or limits on stocks or bycatch have not been set in these FMPs. Without meaningful targets, it will not be able to meet the objectives of the Fisheries Act or target of achieving Good Environmental Status (GES).

The Government decision to introduce closures of all commercial sandeel fisheries across UK waters is a positive step in pressure reduction and increase in prey availability for key seabirds. However, the recent challenge is a clear indication that the Government needs to maintain a strong position if it is to lead the way to achieving the GBF targets.

### What is needed

- Set catch limits in line with ICES scientific advice to restore fish populations and the fishing industry to a sustainable level.
- Implement an ecosystem-based approach to fisheries management, to ensure that negative impacts of fishing activities on the marine ecosystem are minimised and ensure that aquaculture and fisheries activities avoid the degradation of the marine environment. This will also contribute to achieving GES.
- Publish Stage Three and Stage Four Byelaws through the Marine Management Organisation (MMO)

programme to ensure the Marine Protected Area (MPA) network is protected from the most damaging forms of fishing by the end of 2024. MPAs must be protected across the whole site.

- The Government must place a time-bound commitment on its promise to deliver mandatory REM, including expanding measures to all vessels of all sizes. This must include a strategy to eliminate all unwanted bycatch which persists as one of the biggest causes of death for seabirds, cetaceans, seals and poor fish spawning.
- Ensure time-bounded and meaningful targets and objectives are set in the incoming FMPs and ensure all FMPs are delivering towards the same goals in the Fisheries Act. Alongside, work to adjust catch limits downward to take into account fisheries activities outside the MPA network and, wherever possible, work in collaboration with the fishing industry to consider sustainable alternatives.

## Sustainability: Forestry

### Some progress

#### Rationale

The England Tree Action Plan 2021-2024 has so far served as the primary mechanism to deliver woodland creation targets. The Nature for Climate Fund (NCF) has led to a 45% increase in woodland creation in 2023-24 compared with 2022-23, and more than double what was achieved in 2021-22. However, with the England Tree Action Plan due to end in 2024 and the NCF in 2025, clearer plans are needed especially if tree planting is to transition to ELM. This should also include additional activities in the NCF such as tree nurseries, skills and community forests. It is unclear what will provide this central, coordinating drive when the Action Plan ends in 2024.

The current Forestry Commission definition of sustainable woodland management is not strong enough to ensure biodiversity friendly activities. Government's sustainable woodland management definition should be replaced with one that defines

'conservation woodland management', and accurately describes practices and monitoring needed to meet biodiversity objectives in woodland management.

Currently, the Government cannot place conditions when granting felling licences to ensure felling activity is delivered in line with nature's needs. Under current conditions an ancient woodland replanted with damaging conifers would currently count towards Forestry Commission's sustainable management target.

There is a lack of publicly available monitoring to demonstrate on the ground compliance with the UK Forestry Standard (UKFS) and some of the key sustainability requirements in the UKFS only require the woodland owner to "consider" the sustainable action for wildlife, rather than adopt them where possible.

Defra's 'Keepers of Time' policy document sets out welcome aspirations to improve woodland management for nature within ancient woodland. Two years on from the document's publication however, progress has been sorely lacking with only one hectare of plantation on ancient woodland in private hands reported as being supported by Government into restoration in 2022/23.

Approximately 43% of woodland in the UK is UK Woodland Assurance Standard (UKWAS) certified but rates of uptake are the lowest in public forest estate (Forestry England) and charity owned land. The UKWAS certification should be further recognised and supported by the Government, with measures to increase its uptake in both commercial and wider woodlands, including small estate woodlands where entry to this scheme is more challenging.

Existing pressures on woodland and forest environments are not managed, reducing the resilience of these environments. Established INNS including *Rhododendron ponticum*, grey squirrels and deer lack management strategies. Additionally, further work is required to ensure that hands-off or minimal management is accepted as a viable and potentially optimal management strategy in certain situations as over-management of sites can also result in damage.

## What is needed

- Full statutory protection of Ancient Woodlands (equivalent to Sites of Special Scientific Interest (SSSIs).
- Defra, Forestry Commission England and Forestry England should commit to creating a costed, time bound delivery plan to fulfil their commitment to restore plantation on ancient woodland sites within public and private ownerships. The plan should include dedicated targets to improve condition and ensure designated woods are given sufficient grant funding and regulation oversight needed to get more into favourable condition.
- Support for the buffering and reconnection of Ancient Woodland fragments, including extended (100m) buffers to provide space for natural colonisation and regeneration.
- Government should commission a review of UK Forestry Standard compliance on the ground, beyond areas within grant schemes.
- Government must prioritise the management of INNS and air pollution as part of improving woodland condition and resilience.



# 11. PEOPLE & NATURE

Restore, maintain and enhance nature's contributions to people, including ecosystem functions and services, such as the regulation of air, water and climate, soil health, pollination and reduction of disease risk, as well as protection from natural hazards and disasters, through nature-based solutions and/or ecosystem-based approaches for the benefit of all people and nature.

## Little progress

### Rationale

We welcome the Government's commitments and policies which embed people specifically into nature policies, including the EIP pledge to ensure all people have access to a green or blue space within 15 minutes of home, and the development of a new Green Infrastructure Framework. However, the Government must go further and faster in these areas. There are currently no policies designed to deliver the EIP 15 minute commitment. The Green Infrastructure Framework, including Standards, is voluntary, not mandatory, which is not likely to result in much change in new development.

We also welcome the piloting of green social prescribing approaches - these must be supported by longer-term funding and public promotion to ensure the pilots continue and expand the approach across the country.

### What is needed

- A strategic and well-funded approach to ensure delivery of the commitment for all people to have access to nature within a 15 minute walk of home, including through funding and support for local authorities to develop and implement local Green

Infrastructure Strategies and new requirements for developers to meet Green Infrastructure Standards in all new development.

- Introduce a new Environmental Rights Bill, which incorporates the Aarhus Convention rights to access environmental information, public participation in environmental decision-making, and environmental justice, and formally recognises a new legal right to a healthy natural environment for all.



# 12. URBAN AREAS

Significantly increase the area and quality, and connectivity of, access to, and benefits from green and blue spaces in urban and densely populated areas sustainably, by mainstreaming the conservation and sustainable use of biodiversity, and ensure biodiversity-inclusive urban planning, enhancing native biodiversity, ecological connectivity and integrity, and improving human health and well-being and connection to nature, and contributing to inclusive and sustainable urbanisation and to the provision of ecosystem functions and services.

## Some progress

### Rationale

There are several policies in place to increase and improve biodiversity and access to green and blue spaces in urban areas in England, but the Government must go further in policy to ensure they genuinely deliver for people and nature.

Biodiversity Net Gain (BNG), the requirement for development to ensure habitat is in a better state (by 10% gain) than it was before the development, is now mandatory for most new housing development in England. If done well and with strengthened ambition, it could ensure that habitats are improved across the country, including in urban areas and in new housing development. However, there are potential loopholes around the monitoring and enforcement of biodiversity units, in particular for onsite delivery of net gain, which could result in less improvement and creation of habitat in urban areas and in onsite in new developments. In addition, the Government has restricted project and local ambition by allowing the selling-on of excess units from a particular project and by making it more difficult for local authorities to set more ambitious levels of gain than the national 10% requirement.

We also welcome the Green Infrastructure Framework, including the access to nature standards. However, these are voluntary and are not likely to result in much change

in new development. The new Government recently announced 'golden rules' for new development, including access to green space requirements, but these are only applicable to a narrow set of development on previously developed Green Belt land. Access to nature standards should be made mandatory for all new developments.

While there are references to biodiversity and nature-friendly design in planning policy and guidance, the Government could go further in mainstreaming nature-friendly design in all developments, such as swift bricks.

The Government has committed to, but not yet followed through on, implementing Schedule 3 of the Flood and Water Management Act 2010 (due to be implemented in 2023, but delayed) which would deliver more Sustainable Drainage Systems (SuDS) in new housing developments, improving water drainage and boosting biodiversity.

Lastly, the new Government has committed to hire 300 new planning officers. This is a welcome recognition of the importance of planning officers to ensure planning and development works for climate, nature and people, and of the under-resourced state of local planning authorities. However, this is not sufficient to help fill the funding or capacity gap in local areas, nor to tackle the dearth of ecological expertise in local planning authorities, which is vital to ensuring urban areas have high quality and nature-rich green and blue spaces for people and wildlife to benefit from and enjoy.

### What is needed

- Address implementation gaps in policy and guidance for BNG to ensure it is delivering a genuine net gain for nature.
- Achieving the Green Infrastructure Standards should be mandatory in all new developments.
- Mandate nature-friendly design in all new housing and infrastructure development, requiring suitably designed and located swift bricks, bat boxes and bee bricks where appropriate, as well as green and brown roofs on flat spaces, and other green and blue infrastructure.
- Pledge £5.5 billion over 5 years to local authorities to level up urban green spaces and a longer-term programme of investment for green infrastructure.

## 13. BENEFIT SHARING

Take effective legal, policy, administrative and capacity-building measures at all levels, as appropriate, to ensure the fair and equitable sharing of benefits that arise from the utilisation of genetic resources and from digital sequence information on genetic resources, as well as traditional knowledge associated with genetic resources, and facilitating appropriate access to genetic resources, and by 2030, facilitating a significant increase of the benefits shared, in accordance with applicable international access and benefit-sharing instruments.

Unable to assess



## 14. MAIN-STREAMING

Ensure the full integration of biodiversity and its multiple values into policies, regulations, planning and development processes, poverty eradication strategies, strategic environmental assessments, environmental impact assessments and, as appropriate, national accounting, within and across all levels of government and across all sectors, in particular those with significant impacts on biodiversity, progressively aligning all relevant public and private activities, and fiscal and financial flows with the goals and targets of this framework.

Some progress

### *Rationale*

The duty on policy makers to have due regard to the Environmental Principles Policy Statement came into effect at the end of last year (2023). It is early days on whether it is building in environmental considerations to government policy making as was intended, and there are concerns that the duty may be overlooked when policy is developed rapidly or by arm's length bodies when they are making policy on behalf of ministers. A recent High Court judgement has also cast doubt on whether the government is applying the duty consistently at early stages of the policy making process. The implementation of the duty is being reviewed by the Office for Environmental Protection (OEP) and Defra.

Another policy that has been introduced as a result of the Environment Act 2021 is the updated biodiversity duty on public bodies. This policy calls for public bodies operating in England to 'consider what they can do to conserve and enhance biodiversity'.

With regard to environmental impact assessments, the Government has powers through the Levelling Up

and Regeneration Act to reform Strategic Environmental Assessment (SEA) and Environmental Impact Assessment (EIA) which embeds environmental considerations into specific plans and project proposals. However, it is not clear whether the new administration will take forward these proposed reforms. If they do choose to reform environmental assessment, there remains a great deal of uncertainty about what these new Environmental Outcomes Reports (EORs) will look like, how they will operate, and whether they will support high quality environmental decision-making, not just swift decisions.

The Environmental Improvement Plan (EIP), published in early 2023, is the first revision of the 2018 25 Year Environment Plan. The cross-Government document sets out how to bring England's natural world back to good health. Whilst this comprehensive approach is welcome, it lacks clear detail about how each government department will contribute to the delivery of this objective. The environmental oversight body, the OEP, has recommended that the Government should speed up, scale up and show how its plans stack up, to meet the environmental targets. The Government published its Annual Progress Report on the EIP in July 2024, which contained no further delivery information. However, the new Government has committed to a rapid review of the EIP to ensure it is fit for purpose. This will be completed by the end of 2024.

The Dasgupta Review on the economics of biodiversity was commissioned by the Treasury and published in 2020. The Government responded in 2021. The Review included recommendations to embed nature into economic decision-making, recognising that economic prosperity and environmental protection are two sides of the same coin. However, its implementation has been limited.

### *What is needed*

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- Publish detailed delivery information as part of the rapid EIP review, to demonstrate that policies, actions and funding are in place in order to meet the Environment Act targets and other EIP commitments.

- Any reform of environmental assessment must not weaken any particular environmental protections, as well as meet the statutory requirement not to reduce the 'overall level' of environmental protection.
- Take forward the Dasgupta Review recommendations to integrate biodiversity into economic and financial policy and decision-making, including national accounting.



# 15. BUSINESS

Take legal, administrative or policy measures to encourage and enable business, and in particular to ensure that large and transnational companies and financial institutions:

(a) Regularly monitor, assess, and transparently disclose their risks, dependencies and impacts on biodiversity, including with requirements for all large as well as transnational companies and financial institutions along their operations, supply and value chains, and portfolios;

(b) Provide information needed to consumers to promote sustainable consumption patterns;

(c) Report on compliance with access and benefit-sharing regulations and measures, as applicable;

in order to progressively reduce negative impacts on biodiversity, increase positive impacts, reduce biodiversity-related risks to business and financial institutions, and promote actions to ensure sustainable patterns of production.

## Some progress

### Rationale

The government supported the development of the Taskforce for Nature Related Financial Disclosures (TNFD), which was launched in September 2023. The set of recommendations developed by the taskforce encourages businesses and financial institutions to report and act on evolving nature-related dependencies, impacts, risks and opportunities. However, reporting under the TNFD remains not mandatory in the UK.

Businesses and financial institutions are required to report on climate related risks and impacts, following the recommendations under the adjacent Taskforce for Climate-related Financial Disclosures (TCFD). To support companies to develop 'gold standard'

transition plans for this, HM Treasury established the Transition Plans Taskforce in 2022. These are both positive steps to ensure that businesses incorporate the environment into their decision making. While the Transition Plan Taskforce (TPT) framework does include some limited consideration of nature in net zero transition plans, how the TPT framework will be used in transition plan rules for companies is not yet clear, including whether or not its use will be mandatory. Nature must be incorporated into net zero transition plans, with reference to the existing TPT Framework, and in the future, transition plans should address both the nature-positive transition and net zero transition.

Most recently, in its national target-setting under CBD, the UK Government said that future Sustainability Disclosure Requirements will go beyond the TCFD and bring in 'new and existing sustainability reporting requirements - particularly those from the IFRS Foundation (ISSB)'. However, the ISSB has yet to develop a nature-related reporting standard, and there are risks that this may put less emphasis on disclosing business impacts on nature than is possible under TNFD, instead emphasising risks to the business.

The Government has recently introduced a requirement for certain household goods to carry a water efficiency label to help consumers reduce their water use and save money on bills. Many food products already use eco-labels in the UK, however these are often from independent schemes. Government guidance on labelling here would provide much-needed consistency and transparency to better inform consumer choices and trust in the ratings presented.

### What is needed:

- Make reporting to the TNFD mandatory for large companies and financial institutions.
- Require nature to be incorporated into net zero transition plans, with reference to the existing Transition Plan Taskforce Framework.
- Progress should be made towards requiring transition plans which address both the nature-positive transition and net zero transition.
- Government should provide guidance on product labelling to improve consistency and transparency to better inform consumer choices.



# 16. CONSUMPTION

Ensure that people are encouraged and enabled to make sustainable consumption choices, including by establishing supportive policy, legislative or regulatory frameworks, improving education and access to relevant and accurate information and alternatives, and by 2030, reduce the global footprint of consumption in an equitable manner, including through halving global food waste, significantly reducing overconsumption and substantially reducing waste generation, in order for all people to live well in harmony with Mother Earth.

## Little progress

### Rationale

An assessment of the UK's consumption and production footprint shows the UK needs to reduce its global footprint by around three quarters by 2030 to meet planetary limits.

The UK national targets to deliver the GBF were communicated in early August 2024; on Target 16 there is a significant gap between commitments made by the UK and the GBF target to reduce the global footprint of consumption.

Globally, over 55% of carbon emissions and 90% of biodiversity loss and severe water stress are caused by resource extraction and processing. To address this, we need a rapid shift away from our unsustainable linear 'take, use, throw' industrial and consumer system, to a new, Circular Economy which will contribute to conserving England's natural environment and reducing our overseas consumption footprint.

The Government's commitment to introducing a Circular Economy Roadmap is a welcome step towards delivering a zero-waste economy by 2050. This should set a new strategic direction for Defra, ensuring all waste related policies are moved further up the waste hierarchy. However, we need to see real action to achieve this ambitious goal. This must start with the

speedy implementation of its Collection and Packaging Reforms; including DRS, pEPR & Simpler Recycling.

But there is an opportunity to go further and consider how to mitigate the impacts of the UK's consumption across a broader range of sectors, underpinned by an ambition to reduce the UK's global footprint. For example, despite being promised in the 2021 Environment Act, secondary legislation on due diligence for deforestation-risk commodities has still not been introduced and we are now falling behind the EU whose EU Deforestation Regulation came into force in 2023.

### What is needed:

- A full assessment of the UK's consumption footprint, setting targets for footprint reduction, establishing sectoral actions to address overconsumption and reduce global footprint, and outlining indicators to measure progress. For more details, WWF has recently produced guidance on how NBSAPs can better integrate footprint.<sup>30</sup>
- A target to halve the UK's material footprint and a series of sector specific resource efficiency targets to achieve this goal.
- Implementing a Roadmap to a Circular Economy as soon as possible, focusing on mirroring positive EU legislation such as Right to Repair.
- Establish a Joint Circular Economy Unit across Defra and Department of Energy Security and Net Zero (DESNZ) to ensure integrated policy and decision-making.
- Introducing consultations for Extended Producer Responsibility for textiles, construction materials, end-of-life fishing gear and other priority sectors to shift the responsibility of waste management onto producers.
- Make food waste reporting mandatory for all large companies and introduce mandatory pre-farm gate reporting to ensure less waste is created at source.
- Government to bring forward secondary legislation on due diligence for deforestation risk commodities without further delay to tackle the impact of UK supply chains on global deforestation and land degradation.

- Setting and adhering to core standards in trade agreements, including certification schemes for sustainable production where their positive impact is recognised, such as Roundtable on Sustainable Palm Oil certification for palm oil.
- Further invest in the development of the Global Environmental Impacts of Consumption (GEIC) indicator and adopt reduction targets for the dashboard of consumption footprints within.



## 17. BIO-TECHNOLOGY

Establish, strengthen capacity for, and implement in all countries, biosafety measures as set out in Article 8(g) of the Convention on Biological Diversity and measures for the handling of biotechnology and distribution of its benefits as set out in Article 19 of the Convention.

### Unable to assess

#### *Rationale*

In March 2023, the Genetic Technology (Precision Breeding) Act 2023 was passed, creating a new regulatory framework for the release, marketing and risk assessment of plants and animals produced through 'precision breeding', delivered through the editing of genes.

While the Act contains some checks and balances, there are concerns that this new framework is much less robust than current regulations around Genetically Modified Organisms, including plants and animals produced by inserting genes from different species. Precision breeding raises significant environmental and ethical concerns - and welfare concerns, in the case of animals. Even small changes to individual genes can have wide-ranging and unpredictable consequences for an animal or plant's entire genome. These potential benefits and risks should be balanced by adding robust safeguards to the legislation, specifically covering animal welfare and ecological health.

# 18. SUBSIDIES

Identify by 2025, and eliminate, phase out or reform incentives, including subsidies, harmful for biodiversity, in a proportionate, just, fair, effective and equitable way, while substantially and progressively reducing them by at least \$500 billion per year by 2030, starting with the most harmful incentives, and scale up positive incentives for the conservation and sustainable use of biodiversity.

## Little progress

### Rationale

**Biomass subsidies:** Bioenergy receives significant financial support from the UK government, despite concerns about the climate and biodiversity impact of bioenergy. For example, Drax - the EU's largest biomass power generator and UK's single largest CO2 emitter - earned £893m in subsidies in 2021, whilst also benefiting from multi-million pound carbon tax breaks. Due to an exemption based on bioenergy's supposed carbon neutral status, biomass power generators are not required to pay carbon taxes under the UK ETS. The Conservative Government planned to provide the Drax power plant extra subsidies to fit carbon capture technology.

**Farming subsidies:** In England, the UK Government has committed to moving away from direct payments and instead focus public money predominately on public goods. However, whilst Defra has started to reduce direct payments, the new ELM schemes are not fully operational. There is still a risk that scheme payments are designed to subsidise farm income, as opposed to driving environmental delivery. Defra must ensure that all ELM payments are compatible with the World Trade Organisation Agreement on Agriculture Green Box rules.

**Fishing subsidies:** The UK seafood fund is a £100

million programme of investment in UK fisheries, due to run from 2021 to 2025. This one-off fund to support fishing has five objectives, one of which is to support an 'environmentally sustainable fishing industry'. However, public information on how the fund has been spent to date is limited. This information should be published to enable an assessment of whether or not this new fishing incentive is harmful or negative to biodiversity.

**Oil and gas:** The new Government was clear on licensing in their manifesto, that they will not issue new oil and gas licences for the North Sea. The Government must place its commitment to 'no new oil and gas licences' onto the statute book to ensure it is protected for generations to come and better enforce the existing oil and gas activities to tackle chronic spills. In July 2024, the Government announced the Energy Profits Levy will increase from 35% to 38%, bringing the headline rate of tax on upstream oil and gas activities to 78%. The Government has extended the application of this levy until March 2030. It has also removed unjustifiably generous investment allowances under the Energy Profits Levy, abolishing the levy's main 29% investment allowance.



# 19. FINANCE

Substantially and progressively increase the level of financial resources from all sources, in an effective, timely and easily accessible manner, including domestic, international, public and private resources, in accordance with Article 20 of the Convention, to implement national biodiversity strategies and action plans, mobilising at least \$200 billion per year by 2030, including by:

(a) Increasing total biodiversity related international financial resources from developed countries, including official development assistance, and from countries that voluntarily assume obligations of developed country Parties, to developing countries, in particular the least developed countries and small island developing States, as well as countries with economies in transition, to at least \$20 billion per year by 2025, and to at least \$30 billion per year by 2030;

(b) Significantly increasing domestic resource mobilisation, facilitated by the preparation and implementation of national biodiversity finance plans or similar instruments according to national needs, priorities and circumstances;

(c) Leveraging private finance, promoting blended finance, implementing strategies for raising new and additional resources, and encouraging the private sector to invest in biodiversity, including through impact funds and other instruments;

(d) Stimulating innovative schemes such as payment for ecosystem services, green bonds, biodiversity offsets and credits, and benefit-sharing mechanisms, with environmental and social safeguards;

(e) Optimising co-benefits and synergies of finance targeting the biodiversity and climate crises;

(f) Enhancing the role of collective actions, including by indigenous peoples and local communities, Mother Earth centric actions and non-market-based approaches including community based natural resource management and civil society cooperation and solidarity aimed at the conservation of biodiversity;

(g) Enhancing the effectiveness, efficiency and transparency of resource provision and use;

## Unable to assess

### *Rationale*

The Government is right to look for ways to accelerate nature-based solutions to climate change, but a market-based model is not necessary. Instead, we recommend that UK ETS revenues are paid into a strategic nature-based solutions fund and allocated by a suitable public body to projects that enhance nature to reduce carbon emissions (either avoidance or sequestration). Investment could be maintained in the long-term as UK ETS revenues fall by ramping up a Nature Recovery Obligation on relevant sectors and weighting allocation of those funds for nature-based solutions to climate change.

The Nature Markets Framework set a goal to grow annual private investment flows to nature to at least £500 million every year by 2027 in England, rising to more than £1 billion by 2030. Progress on this includes mandatory BNG, Projects for Nature programme to connect businesses to conservation action, the growth of voluntary carbon credit schemes. As part of this, the Government have also committed to grow the market for nutrient mitigation credits, worth £110 million. Round 2 of the Local Nutrient Mitigation Fund was run in early 2024.

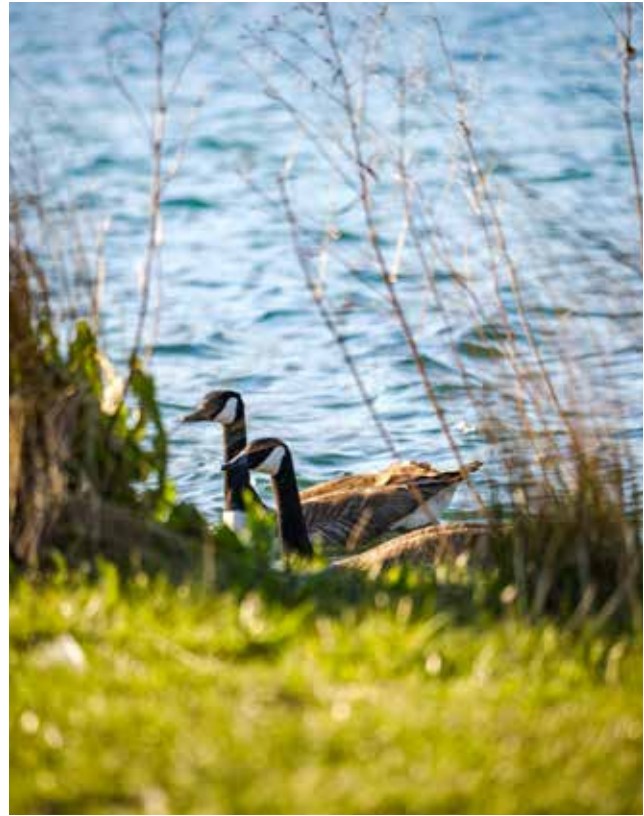
In March 2024, £25 million of funding for nature projects was announced through the Species Survival Fund. The Nature for Climate Fund, originally £640m and expanded to £750m, is dedicated to support

nature-based projects that support progress on climate change mitigation and adaptation. This fund is due to end in March 2025.

Under Target 19a of the GBF, developed country governments committed to mobilise \$20 billion USD per year by 2025 in international biodiversity finance for developing countries. One vehicle through which to deliver this commitment is for countries to put funds into the Global Biodiversity Framework Fund. However so far, the UK has only committed an initial £10 million contribution to the fund.<sup>31</sup>

### What is needed:

- Outline a clear plan with specific milestones, by the end of this year, for delivering the UK's fair share of the commitment by donor countries to provide \$20 billion in nature financing by 2025.
- Publish a refreshed Green Finance Strategy that sets out how the nature finance gap will be addressed, with the necessary target for private and public funding to address it.
- Ensure that ecosystem markets are high integrity through government-backed, robust standards and strong governance of markets, including requirements for buyers to demonstrate that they are taking actions to reduce impacts on nature before purchasing credits.
- Expansion and continuation of the Nature for Climate Fund.
- Improve Sustainability Disclosure Requirements to include requirements for nature alongside climate.



## 20. CAPACITY BUILDING

Strengthen capacity-building and development, access to and transfer of technology, and promote development of and access to innovation and technical and scientific cooperation, including through South-South, North-South and triangular cooperation, to meet the needs for effective implementation, particularly in developing countries, fostering joint technology development and joint scientific research programmes for the conservation and sustainable use of biodiversity and strengthening scientific research and monitoring capacities, commensurate with the ambition of the goals and targets of the Framework.

Unable to assess



# 21. INFORMATION

Ensure that the best available data, information and knowledge are accessible to decision makers, practitioners and the public to guide effective and equitable governance, integrated and participatory management of biodiversity, and to strengthen communication, awareness-raising, education, monitoring, research and knowledge management and, also in this context, traditional knowledge, innovations, practices and technologies of indigenous peoples and local communities should only be accessed with their free, prior and informed consent, in accordance with national legislation.

## Some progress

### Rationale

There is England-level support for a wide range of biodiversity monitoring programmes covering species and sites. These exist alongside outreach and communication material aimed at decision makers, practitioners and the public, including England-level indicators, the State of Nature report and the Outcome Indicator Framework. There is work to be done to improve and support these existing reporting mechanisms and datasets and to fill the gaps in environmental data, for example, to verify, improve and expand monitoring across taxa and in the marine environment. There is a need for peer-review publication with full, accessible descriptions of biodiversity datasets and associated data treatment and analytical methods. A need for greater communication, cooperation and sharing within a diverse community that relates to biodiversity-related data, information and knowledge.

The Government has acknowledged the importance of good quality and available environmental data for good decision-making. There are several initiatives aimed at improving the state of environmental data in England,

including the Natural Capital and Ecosystem Assessment (NCEA) and work to improve the accessibility of planning data.

There is a need for up-to-date condition assessments for protected sites; the EIP includes an interim target for all Sites of Special Scientific Interest (SSSIs) to have an up-to-date condition assessment by 31 January 2028, and a framework for the assessment and monitoring of other effective conservation measures (OECMs). A quarter of all SSSI units in England have not been assessed since 2010<sup>32</sup> and 66% by area have not been assessed in the last decade.<sup>33</sup> Making progress here will be contingent on the provision of adequate funding to, and prioritisation of, condition assessment within Natural England. There is also, as the Campaign for National Parks' recent health check makes clear, there is a lack of baseline information of nature within landscapes, which are now expected to report progress against the Targets and Outcomes Framework for Protected Landscapes.<sup>34</sup> Indeed, there is a lack of definition on what type of land/areas would contribute to the stated 30x30 target, how they would be measured and reported.

BNG has the potential to make a valuable contribution to nature recovery, but the current site register is inadequate for that purpose. The lack of standardised geo-spatial data restricts transparency and makes monitoring and evaluation of the outcomes impractical/impossible. Further, the omission of on-site gains means that we lack the ability to genuinely assess delivery and judge progress in the round.

The Government has stated its intention, but not introduced any specific policies, to ensure that these databases and platforms are aligned to give decision-makers, developers, and local communities easier access to better data to inform choices.

Any reform of environmental assessment must include a robust approach to providing and clearly communicating environmental information and engaging and taking into account local community information and perspectives.

The Government has published a Department for Education (DfE) Sustainability and Climate Change Strategy, which is a welcome recognition of the importance of the role of nature within formal education to further biodiversity conservation. However, the current plans do not go far enough to guarantee that every child in England has the level of access, contact and quality of connection with nature required to achieve the vision of the EIP and the DfE's strategy.

### ***What is needed:***

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- Improve existing datasets and to fill the gaps in environmental data, especially to verify, improve and expand monitoring across taxa, and in the marine environment. Put support in place for all data providers to ensure the data collection and analysis can be updated annually (or as appropriate). Drive improvements in standardised status and trend analysis, data checking, quality control, including consideration of sample sizes.
- Greater support for communication and cooperation within the community that relates to biodiversity-related data, information and knowledge.
- Adequate funding and ring-fenced resources to address the lack of up-to-date condition assessments of protected sites and the lack of baseline data on the state of nature within England's Protected Landscapes.
- Compulsory geospatial data reporting for potential nature delivery within England's BNG policy and register.
- The Government should take more decisive action to ensure that datasets are aligned and readily available to decision-makers, developers, and local communities to inform better choices for the environment, including by setting national standards for environmental data and creating a shared data platform accessible to all. This Environmental Observatory could include all existing government-held data and resources and should signpost to other data sources, such as the species' occurrence data platform run by the National Biodiversity

Network Trust (NBN Atlas), data from NGOs, data from Local Environmental Record Centres and information collected by Local Nature Partnerships and Local Nature Recovery Strategies.

- Data collected through environmental assessment evidence-gathering and monitoring should be shared and made available and usable for other purposes, to improve the existing environmental evidence base, which can then be mobilised for future environment assessments and inform best practice.
- Introduce a statutory requirement for nature within all education settings in England to provide access to and regular high-quality engagement with nature; ensuring all children have equal opportunity to benefit from connecting and engaging experientially with nature.



## 22. INDIGENOUS PEOPLE

Ensure the full, equitable, inclusive, effective and gender-responsive representation and participation in decision-making, and access to justice and information related to biodiversity by indigenous peoples and local communities, respecting their cultures and their rights over lands, territories, resources, and traditional knowledge, as well as by women and girls, children and youth, and persons with disabilities and ensure the full protection of environmental human rights defenders.

### Unable to assess

#### Rationale

In England, the public sector equality duty requires public authorities to consider eliminating discrimination, including on the basis of race, including colour, nationality, ethnic or national origin, religion or belief, sex, and disability, when making decisions about how they provide services and implement policies.

The UK is also required to comply with the Aarhus Convention, which sets out the right to access information, the right to public participation in decision-making, and the right to access to justice. However, the Government has adopted legislative changes since 2015 that the Aarhus Convention Compliance Committee has concluded render the UK not only in breach of its international obligations but is moving further away from compliance.

The end of mission statement of the UN Special Rapporteur on Environmental Defenders under the Aarhus Convention specifically called attention to the increasingly severe crackdowns on environmental defenders in the UK, including the exercise of the right to peaceful protest.<sup>35</sup> In particular, the implementation of the new restrictions under the

Police, Crime, Sentencing and Courts Act 2022 and Public Order Act 2023 has resulted in the excessive punishment of, and imposition of harsh bail conditions on, peaceful environmental defenders. Severe limitations also remain on access to justice, including prohibitive expenses and the variations to Aarhus cost caps. Link has outlined the issues with these restrictions in detail in its joint ELUK 2024 statement to the 28th meeting of the Working Group of the Parties to the Aarhus Convention and 16th Meeting of the Task Force on Access to Justice.<sup>36</sup>

There are no policies or provisions relating specifically to the full, equitable, inclusive, effective and gender-responsive representation and participation in decision-making, and access to justice and information related to biodiversity by indigenous peoples, nor any other minority groups protected under UK equality and human rights law. The potential for offshoring environmental impacts through policies set in the UK should be carefully considered and avoided.

There are some policies which provide opportunities for local communities to be represented and participate in decision-making regarding biodiversity, but these must be strengthened. For example, there is no obligation for Local Nature Recovery Strategies to be developed in a participatory way, only a requirement for public consultation at the end of the process, which does not fulfil a basic standard of participation.

An Environmental Rights Bill would not only strengthen the duties of public authorities and decision-makers to avoid environmental harm - it would also fully integrate Aarhus rights into UK law. In effect, an Environmental Rights Bill would empower the public to do more to directly challenge failures by decision makers to uphold their environmental duties, access justice in the event of environmental harm and set out vital protections for environmental defenders. The strengthening of everyone's environmental rights, through the Bill's formal recognition of a legal right to a healthy environment, the transposition of the Aarhus rights to know, engage and challenge into UK law, and the protection of the right to peacefully



protest, will better equip people to act to protect local green and blue spaces.<sup>37</sup>

Therefore, we strongly recommend the introduction of an Environmental Rights Bill to both enshrine a legal right to a healthy natural environment for all people and to embed the Aarhus principles for access to environmental information and justice in UK law.



## 23. GENDER

Ensure gender equality in the implementation of the Framework through a gender-responsive approach, where all women and girls have equal opportunity and capacity to contribute to the three objectives of the Convention, including by recognizing their equal rights and access to land and natural resources and their full, equitable, meaningful and informed participation and leadership at all levels of action, engagement, policy and decision-making related to biodiversity.

### Unable to assess

#### *Rationale*

In England, the public sector equality duty requires public authorities to consider eliminating discrimination, including on the basis of race, including colour, nationality, ethnic or national origin, religion or belief, sex, and disability, when making decisions about how they provide services and implement policies.

However, there are no policies or provisions relating specifically to ensuring gender equality in the implementation of the Framework through a gender-responsive approach, including ensuring full, equitable and meaningful and informed participation of all women and girls at all levels of action, engagement, policy and decision-making related to biodiversity.

The strengthening of everyone's environmental rights in a new Environmental Rights Bill, through formal recognition of a legal right to a healthy environment, the transposition of the Aarhus rights to know, engage and challenge into UK law, and the protection of the right to peacefully protest, will better equip people, including women and girls, to act to protect clean air, clean water, and local green and blue spaces.<sup>38</sup>

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# SUPPORTERS

This assessment has been developed by a range of organisations with expertise on the targets of the GBF. It aims to form a holistic assessment of the current progress in the UK, and includes a broad range of recommendations on specific policy areas. Organisations supporting this report do not necessarily endorse every recommendation to government.



Wildlife and  
Countryside



Wildlife and Countryside Link is the largest environment and wildlife coalition in England, bringing together 86 organisations to use their strong joint voice for the protection of nature. Our members campaign to conserve and enhance landscapes, animals, plants, habitats, rivers and seas and to improve access to nature for communities across the country. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

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