

RSPB Evidence submission to Bright Blue

The RSPB is the UK's largest nature conservation organisation, with over 1.2 million members. We manage in excess of 150,000 hectares of land across the UK. Our conservation science and policy work covers a broad range of areas which impact on nature – from climate change, to farming and land use, to planning policy and marine protection. We are also a part of the Birdlife International family of conservation organisations, and play an active role in international conservation efforts including through the UN processes (UNFCCC, CBD, CDGs, for example).

The evidence below is selective and high level due to the length restriction imposed. We can provide further evidence on the other questions, or additional information on points below, should that be of use.

Rural

1. Where is there scope for the agricultural sector to assist in mitigating carbon emissions (for example, through carbon sinks)?

Around 70% of the UK is agricultural land, and farming will therefore need to play a key role in mitigating emissions. Supporting farmers to create habitats such as woodlands, to restore habitats such as peatlands capable of sequestering huge amounts of carbon¹ and to maintain carbon rich habitats such as unimproved species rich grasslands will play a key role in mitigating emissions in the future. Commitments from governments in England and Wales to reform agriculture policy to better reward these and other public goods is therefore a crucial step forward.

Agricultural production is also a significant source of greenhouse gas emissions, particularly methane and nitrous oxide. Compared to some other sectors, emissions from agriculture have not reduced compared to the 1990 baseline. Urgent action is therefore needed to reduce emissions from agricultural production. This will need a variety of approaches, ranging from steps to improve the efficiency of production, to reducing demand for high carbon foods such as meat and dairy.

3. What measures or practices can the agricultural sector engage in to best protect or enhance biodiversity in rural Britain?

The measures needed to protect and enhance biodiversity are many and varied. The best approach to take will depend upon the type of agriculture practiced, the range and conservation status of the species and habitats present and whether other environmental objectives, such as water quality, are important in a given area, amongst other factors.

For example, in arable farming areas in the east of England that may have experienced significant declines of farmland wildlife, it will be necessary to change or modify existing management practices such as the use of pesticides and fertilisers. However, this alone will be insufficient, as it will also be necessary to restore a range of resources that different species will need. For example, farmland birds such as the yellowhammer will need what are colloquially described as the 'Big 3'; safe nesting habitat, adequate winter food sources and habitats for invertebrates which they feed their chicks in the spring. Depending on the species, these can be provided in a variety of ways, but will often include a combination of interventions such as more sensitive hedgerow management, creating

¹ http://www.iucn-uk-peatlandprogramme.org/sites/www.iucn-uk-peatlandprogramme.org/files/English%20upland%20peatlands%20report%20Jun14%20Final_1.pdf

flower rich habitats and sowing seed rich habitats. Lowland intensive livestock systems such as dairy farming areas are in many respects similar, as these will also require a combination of changes to management such as spreading of slurries and fertilisers, alongside the creation or restoration of habitats for species.

In some areas though, and on some farms, the focus may be more on maintaining what is there, if there is already a high proportion of habitats or a particular species of interest. Examples of these types of farms may be extensive livestock farms with a high proportion of unimproved species rich grassland, traditional mixed farming systems which can be beneficial for a range of species and habitats or particular types of farming such as organic.

A future policy would have to be sufficiently flexible and responsive in order for farmers and their advisers to tailor interventions according to the state of nature on a given farm.

9. What are the most important public goods provided by the agricultural sector which should be rewarded through government funding?

It is important to recognise that public funding is only one policy response that Government can use to secure public goods. Wildlife and Countryside Link² published a detailed intervention logic looking at a range of public goods in 2017, which provides a more detailed analysis of where public money would be the most appropriate mechanism.

This concluded that biodiversity, as a particularly 'pure' public good would need significant investment of public money. This is on the basis that it is both non-rival and non-excludable, and that improving biodiversity will often require proactive management on behalf of farmers that will need to be incentivised. Climate change mitigation from land use falls into a similar category.

Other public goods such as water quality fall into a greyer area. Poor water quality is often a consequence of damaging activities, many of which are in theory covered by existing regulations that are not enforced adequately. Making better use of regulation in these cases will be needed, in addition to public money to incentivise activity that goes above and beyond this regulatory baseline.

It will be important for Government to publish a detailed intervention logic of their financial priorities as part of a future environmental land management system, and wider agriculture policy.

Marine

The evidence below is supplementary to wider analysis, which we fully support, submitted by Wildlife and Countryside Link.

1. What are the biggest immediate- and longer-term threats to marine ecosystems?

Climate change is the most systemic and existential threat to marine ecosystems. Unfortunately, the very action taken to mitigate these impacts – mass deployment of offshore wind – also poses threats to the UK's marine environment. The RSPB is currently researching collision risk modelling^[1] to better understand the lifetime impacts of the already consented wind farms around the UK. Early indications suggest collision mortality, over the 25-year lifetime of consented projects, could lead to serious declines in the UK populations of key species such as the kittiwake (~1/5th lost) and great

² Wildlife and Countryside Link (2017), A future Sustainable Farming and Land Management Policy for England: A Wildlife and Countryside Link discussion paper. Available at <https://www.wcl.org.uk/docs/Link%20farming%20and%20land%20use%20policy%20paper%20FINAL%20Sep%202017.pdf>

black backed gull (~1/3rd lost). Mortality on this scale will compound existing threats already causing seabird decline.

Anticipated displacement of birds having to avoid wind farms is also a serious concern due to the possible energy implications for affected birds and how this could impact breeding success. The potential for ecosystem wide disruption from the wind sector is great given the scale of existing and future anticipated growth, especially when considered cumulatively with all other human uses of the marine environment which is leading to the creeping industrialisation of our seas.

3. What are the key policies which the Government should introduce to better protect marine environments?

- A comprehensive monitoring programme is urgently needed to determine the current health of our marine species and habitats and how they respond to threats, including wind farms.
- A ecologically coherent, well-managed network of marine protected areas (MPAs) - MPAs and legal frameworks that underpin them should be fully implemented. A process for extending existing sites or including new ones, to fill any gaps within the network should be outlined, with appropriate management measures must be put in place.
- Effective and complete Marine Plans which must take an ecosystem-based approach, meaning they recognise the importance of conserving the health of our marine environment by accommodating the needs of wildlife alongside development needs.
- Sustainable new Fisheries policy which implements an ecosystem-based approach - See WCL submission
- A UK wide risk register of all development activity which takes account of cumulative impacts. This register must inform and support the ambitions of the UK Marine Strategy and be used to guide the delivery of Marine Plans.
- Stronger requirements within consent conditions to ensure that the impacts of developments/activities that do go ahead are better understood and controlled. Including a minimum number of offshore wind turbine monitoring devices per square mile and update of the mitigation action plan(s) based on outputs from monitoring.

4. How successful has the UK's Blue Belt policy been, and how could it be improved?

The UK Overseas Territories Blue Belt programme has been one of the stand out conservation successes of this and the previous Government. Over 4 million square kilometres of ocean will be protected by 2020. At present however, all funding for centralised satellite monitoring, surveillance and enforcement of these vast ocean sanctuaries ceases in March 2020, leaving the prospect of a very high-profile set of 'paper parks' arising at a very embarrassing moment in the year of CBD target setting. The prospect of being left to cover these satellite costs is also deterring local communities in Ascension and Tristan da Cunha from designating the most ambitious marine reserves possible. The UK Government can achieve great efficiencies of scale by retaining centralised surveillance of these Blue Belt sites, rather than devolving it to numerous small communities.

There are also two immediate opportunities to create new large-scale sanctuaries- around the South Sandwich Islands, and around Ascension Island. Over 285 MPs have already backed the call to create a 500,000km² marine reserve in the rich waters around the uninhabited South Sandwich Islands, home to globally significant penguin and whale populations. This is within the gift of the Foreign Secretary and local administration and should be done forthwith.

Urban

3. How can new developments for housing and other infrastructure projects be made more ecologically friendly?

The RSPB is part of a ground-breaking partnership with housing development company Barratt, to look at how large new housing developments can be designed in harmony with nature.

At Kingsbrook, Barratt and David Wilson Homes North Thames (BDWNT), the RSPB and Aylesbury Vale District Council are working to create a great example of a nature-friendly development that reflects the benchmark we wish to see in future developments. The RSPB helped BDWNT develop their designs prior to submission for planning, including collaboration on the Green Infrastructure Design Code. This is part of a national agreement which includes guidance to help Barratt Developments Plc incorporate nature-friendly features throughout operations.

Kingsbrook's villages will contain:

- 60% greenspace, including parks, orchards and a nature reserve.
- Wildlife corridors along hedges, wildflower verges and hedgehog highways.
- Sustainable Urban Drainage; grassy swales, detention basins and ponds.
- Plants chosen for wildlife; native trees and hedges, wildflower meadows and fruit trees.
- Wildlife homes, from integrated birdboxes to frog hibernation spots.

RSPB scientists will monitor how wildlife responds– and people benefit – over 15 years. The intention is to set nature-friendly standards that can be affordably reached in all housing developments, including mainstreaming the viability of products such as swift bricks.

International

2. What are the key policies which the Government should introduce to better protect natural environments abroad?

Overconsumption, unsustainable use of resources and global inequality perpetuate the number of people still living in poverty and hunger, fuel climate change and help to degrade our natural environment, driving habitat loss, species' extinction and population declines in common and rare wildlife.

The Government should recognise the interdependence of the solutions to the three developmental, climate and environmental agendas: Leave no one behind – Net zero – Restore Nature. We would support the following policies to drive this forward:

1. Convention coherence: Promote an ambitious post 2020 CBD architecture which drives real action to reverse biodiversity declines with this integrated across all conventions, including UNFCCC, UNCCD and CMS/AEWA. Back this up with the necessary financial mobilization that recognises the urgency of the climate, environmental and biodiversity extinction crisis.

2. Global footprint metrics and targets: As part of our contribution to the SDGs, the UK needs to measure our global footprint, especially in key goods and commodities. This can be linked to carbon footprint and our impact on global deforestation. An immediate focus should be on the climate and environmental sustainability of biofuel and bioenergy (e.g. the immediate end to the import of wood pellets from SE USA for burning) recognising that their use does not provide the carbon neutrality necessary to halt dangerous climate change (let alone the biodiversity impact).

3. Financial mobilization: From 2019 the UK Government should secure replacement of lost EU LIFE spending of at least £20m per year in the UK and Overseas Territories and a replacement for the loss of £1m per year from the EU's BEST fund which funds biodiversity in the Overseas Territories. Overseas Territories hold 90% of the threatened wildlife for which the UK is responsible, including more penguins than any other nation on Earth, yet their environments are chronically underfunded. And DCMS should secure a new policy to allow future Heritage Lottery Funding to explicitly include the Territories.

Financial resource can also be utilised through UK Overseas Development Aid. UK Aid should: (i) Ensure that all UK aid spending, across all departments is designed to leave the environment and natural ecosystems in a better place; (ii) Integrate locally determined environmental priorities into aid programmes, including consistent championing of the rights of Indigenous Peoples and a recognition of the value of their knowledge and skills as responsible stewards of natural resources (iii) explicitly promote environmental sustainability as part of the solution (iv) make Aid consistent with halving global emissions by 2030 and phasing them out by mid-century, consistent with IPCC SR 1.5.

Finally, the UK Government should significantly scale up and leverage finance for natural-based climate and environmental solutions: protecting and restoring natural ecosystems, such as tropical forests, mangroves and natural grasslands with the multiple benefits that they deliver for people and the climate.

4. Tackle the environmental footprint of UK companies and push for international action:

A legally enforceable Global Pact, based on international best practice, for Strategic Environmental Assessment (SEA) and Environmental Impact Assessment (EIA) should be developed. This is particularly important for foreign investments. Current systems in many countries of companies contracting consultants to do EIAs leads to bias and weak environmental assessment.

UK companies should apply at a minimum, UK legislative standards when working outside the EU with regards to project/programme impact assessment (SEA/EIA) and safeguarding policies regarding protected areas, KBAs or other critical habitats.

The government should introduce legislation to ensure due diligence against deforestation in companies importing commodities, as well as supporting legislation in the EU to introduce requirements for such due diligence in human rights and deforestation with respect to companies purchasing commodities. Currently consultations are underway in the EU about introducing such legislation to combat child labour and deforestation in the cocoa industry.

Finally, Government should ensure mandatory reporting by the corporate sector of environmental impacts, introducing an Accountable Capitalism Act, to make companies legally responsible to all the stakeholders in their supply chains (not just shareholders) as well as the environmental impacts that they have. It would also include mandatory due diligence on the environmental and human rights impacts of all risky commodities & their derivatives, from hard (minerals) to soft (soy, palm, cattle, cocoa, rubber, etc).

4. After Brexit, what provisions could be included in future UK trade agreements to better conserve ecosystems abroad?

There are a range of ways in which the EU's approach to addressing sustainability issues within trade agreements could be improved upon so as to enhance the role that they can play in supporting strong environmental governance and the conservation of threatened ecosystems. As things stand, the environmental provisions in current EU FTAs have generally been found to be flawed in design and poorly implemented in practice.

The starting point, however, needs to be the creation of an overarching framework for addressing trade and sustainability issues within future UK trade agreements. This overarching framework should be rooted in primary legislation and should, at a minimum, include the following elements:

- Identification of core sustainability goals for all future UK trade agreements (one of which should include biodiversity conservation).
- Creation of meaningful substantive and procedural commitments within trade agreements for ensuring that such goals are realised (see below).
- A commitment to independent assessment of the biodiversity impacts of proposed trade agreements in the UK and its trade partners and their respective global supply chains, together with processes to ensure that the results of such assessments can meaningfully influence negotiating processes. Evidence suggests that in relation to biodiversity and land use impacts, there is considerable room for improvement on the EU's current approach.
- A commitment to periodic ex-post assessments of the actual impacts of trade agreements on biodiversity conservation and other sustainability goals in the UK, its trade partners and their global supply chains, and clear processes for dealing with any adverse impacts identified.

In terms of substantive and procedural commitments, the following should be considered:

- Obligations on all parties to effectively implement and enforce their domestic environmental laws, including in relation to the preservation of biodiversity, alongside enforceable commitments to non-regression that prohibit any weakening of such laws and standards.
- Requirements on all parties to ratify and to effectively implement their obligations under core international environmental agreements relating to biodiversity conservation and sustainable development;
- Inclusion of a robust enforcement mechanism in relation to sustainability issues that will lead to meaningful action by relevant actors, addressing the flaws in the current EU model. This should include transparent domestic and bilateral monitoring of implementation and compliance, as well as binding decisions and the possibility of financial penalties under the dispute settlement procedure if environmental conditions are breached.
- A meaningful role for civil society actors in the implementation of trade agreements. Clear mechanisms allowing citizens and civil society organisations to participate effectively in monitoring and enforcement of domestic environmental law as well as the environmental provisions of the agreement, including an ability to lodge formal complaints regarding non-compliance.

This overarching policy framework should also address the issue of parliamentary scrutiny and oversight of future trade negotiations.