

Summary of Joint Nature Conservation Committee, Scottish Natural Heritage, Countryside Council for Wales and English Nature's response to the European Commission on Biodiversity Expert Group consultation on the Biodiversity Communication

- 1.1 We attach great importance to meeting the targets agreed at Malahide in 2004 in order to achieve the Gothenborg 2010 target of halting the loss of biodiversity. Achieving the 2010 target of no biodiversity loss is extremely challenging. The Commission's role through this Communication should be to set out what needs to be done by the EC Commission and the MS to achieve this target. It therefore needs to be ambitious enough to meet the scale of the challenge of the 2010 target and be realistic in implementation. The Commission need to set out the serious intent of all parties to take action to meet it.
- 1.2 We encourage the Commission to strengthen the communication with clear time-bound objectives and targets for both the Commission and Member States in the light of the now urgent need for action to achieve the 2010 target.
- 1.3 If the Communication were explicit as to who will be responsible for taking forward the action needed to implement each of the ten key challenges, then the biodiversity process could gain significant new sense of purpose across the Union.
- 1.4 This should be supported by targets and deadlines for action and annual reviews of progress, and relevant indicators identified by the SEBI 2010 project to measure effectiveness; the communication needs strengthening in this respect.
- 1.5 The relationship between the roadmap and EU BAPs should also be clarified. The BAPs are a Convention on Biological Diversity Article 6 obligation and an assessment of the effectiveness and appropriateness of the EU Biodiversity Action Plans should be used to inform what actions need to be taken post 2010. Such a review should include how successful the plans have been in influencing EU policies and whether the plans are an effective means of bringing about change at EU level.
- 1.6 It is very important that the Communication places more emphasis on monitoring outcomes. It is essential that there are robust, high-level indicators, associated with each challenge, that are consistent with meeting the 2010 target, but which avoids excessive detail. The associated targets to the challenges should be reviewed annually to ensure we are on track.
- 1.7 The agencies are particularly concerned by the lack of emphasis on adequate funding for management of Nature 2000 network in Section 5 and 6. It is important that in resolving this issue funding is not squeezed from delivering other environmental priorities.

- 1.8 The agencies believe that implementation of environmental regulation and investment for environmental objectives is consistent with economic and social development objectives. **We believe the economically thriving regions of tomorrow are those that protect their environment today.**
- 1.9 The agencies believe that implementation of environmental regulation and investment for environmental objectives is consistent with economic and social development objectives. There is now significant evidence from international research that environmental management and regulation does not impede competitiveness and overall economic development. For example, *a recent study indicates that the manufacturing industry in England and Wales could reduce annual operating costs by about £2-2.9 billion via investment in best-practice waste minimisation techniques.
- 1.10 To ensure support across the Commission and Members States for the necessity for adequate funding, it is important that the Biodiversity Communication clearly recognises that ecosystem functionality and biodiversity underpins economic and social welfare.
- 1.11 We would very much welcome mention of the critical role that the three pillars of the Aarhus Convention (access to information, public participation and access to justice) can bring to a sustainable society. Informed scrutiny of policy development and implementation will play a critical role up to and beyond 2010.

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