



From the Chair: Prof. Colin Galbraith
From the Chief Executive: Dr Gemma Harper
Monkstone House, City Road
Peterborough, PE1 1JY, United Kingdom

Email: colin.galbraith@jncc.gov.uk
Email: gemma.harper@jncc.gov.uk
jncc.gov.uk

Edward Barker
2 Marsham Street,
London,
SW1P 4DF.

10th May 2022

Dear Edward,

The UK Joint Nature Conservation Committee (JNCC) welcomes the opportunity to comment on the Government's "Nature Recovery Green Paper: Protected Sites and Species."

The UK's approach to nature conservation has evolved, particularly over the last forty years, and there is now a timely opportunity to review current approaches, particularly within the context of climate change impacts and the global biodiversity crises. Changes are needed to implement a more focussed approach to nature conservation that is effective and that puts it much more at the heart of sustainably meeting societies' needs whilst addressing the biodiversity crisis. The proposals within the Green Paper support this approach.

The Committee would like to stress the importance of engagement with governments across the UK to achieve real and lasting benefits at this scale. The main drivers here are:

- The UK needs to continue to meet its international commitments regarding the natural environment and ensure that it can efficiently report against these.
- Nature across the UK is closely interlinked in both the terrestrial and marine environments.
- Many industries operate cross border, and it is important to ensure these continue to operate within a framework that benefits UK nature recovery.
- The UK sits within a broader biogeographical area and managing this effectively requires cross border co-operation, including ensuring nature can adapt to the impacts of climate change.


The Joint Committee highlights the following key priorities for action:

- Protected sites have formed a cornerstone of nature conservation implementation in the UK for over 70 years. Several studies have shown the benefits they bring and the contribution they have made to preserving and enhancing the most important areas of biodiversity across the UK. However, only half, by area, are in favourable condition. How protected areas are managed in future will be a key factor in their effectiveness in supporting nature recovery.
- Climate change impacts on nature and other environmental pressures are a strong driver for reform of the current system. However, introducing flexibility in managing for nature to accommodate dynamic change and recovery needs careful balancing to ensure there is no overall loss of protection. It is essential to maintain a strong, independent, and impartial statutory agency to oversee this.

- Furthermore, to achieve biodiversity goals and contribute to nature recovery, reform of protected sites needs to be considered as part of a broader suite of land use changes. Establishing protected sites as a truly integrated and interconnected network of sites, creating new sites to compensate for losses elsewhere, enlarging the size of existing sites, and improving the effectiveness of other areas including landscape designations, would provide a more flexible system with a more effective contribution to nature recovery. In short, protected sites should be seen more as key elements of broader ecosystems and integrated with other management activities in the wider environment. Clear direction for how this use will be prioritised spatially will help to secure complementary cross sectoral investment in delivering nature recovery.
- Implementing natural solutions, such as native woodland regeneration, or “natural” coastal management will be important to amplify the benefits the natural environment provides within a sustainable economy.
- Importantly, the development and implementation of environment strategies needs to be underpinned by robust evidence, which increasingly will be drawn from across both public and private sectors. To support this there needs to be a significant improvement in data sharing across these sectors. JNCC stands ready to help facilitate such environmental information and data exchanges.
- A simplified and tiered approach to species protection could potentially benefit nature recovery and could help engagement with stakeholders. Such an approach needs to address a broader suite of threats to species than current legislation, including habitat loss, invasive species, and misplaced unsustainable development.
- The broader context within which nature conservation now needs to operate means that there is good reason to draw elements such as protected areas, species protection and land use and regulation more closely together. The proposals for some restructuring of the ALB landscape could potentially support this approach.
- There may also be some parallel changes in nature conservation practices within the other countries of the UK. JNCC’s role will help ensure sufficient consistency across these approaches and that the UK can transparently communicate this and their effectiveness within international reporting obligations.

The UK Joint Nature Conservation Committee is keen to stress that it has a key role in supporting Defra delivering any consequential changes emerging at a UK scale from this consultation. It particularly highlights the need to consider the impact of differing paces of change across the four countries of the UK. Care is needed to maintain sufficient consistency to ensure that a coherent approach to UK nature recovery is in place for the coming years, at a critical time for nature more widely.

Yours sincerely



Professor Colin A Galbraith
JNCC Chair



Dr Gemma Harper
JNCC Chief Executive Officer