



22 July 2021

The Rt Hon George Eustice MP
Secretary of State for Environment, Food and Rural Affairs
Department for Environment, Food and Rural Affairs
Seacole Block
2 Marsham Street
London, SW1P 4DF

Cc: The Rt Hon Lord Goldsmith of Richmond Park

Dear George,

COPI5 – the UN Biodiversity Conference

I would like to thank you, Lord Goldsmith and your officials for your work and cooperation with our inquiry into COPI5, the UN Biodiversity Conference,¹ which, as you will know, is currently scheduled to be held in Kunming, China, between 11 to 24 October.

Countries from across the globe are expected to come together at COPI5 to agree a new plan for biodiversity for this decade in an effort to halt biodiversity losses. It comes at a critical moment. Biodiversity² is essential for life on Earth, from the sparrows in British gardens to plants and creatures of the Amazon rainforest and the oceans, but it is declining at an unprecedented rate. Globally, animals and plants are becoming extinct at rates at least tens to hundreds times faster than the natural rates,³ and in the UK the abundance of priority species has declined by 60% since 1970.⁴ As we learn from this awful pandemic, we upset nature's delicate balances at our peril. Addressing biodiversity losses is inextricably linked with climate change. Protecting and restoring nature would also bring many benefits. Yet there is a gulf between the urgency and importance of halting biodiversity losses and protecting and restoring nature, and the level of action being taken in pursuit of this.

The Committee⁵ concluded from our evidence sessions that there is a clear and present danger from the loss of biodiversity to the whole future of life on earth, affecting every aspect of our life and society. Based on current indications COPI5 will not deliver what is needed for the world at this critical moment of opportunity. It will not be easy to tackle biodiversity losses; back in 2010, countries came together and agreed an ambitious set of

¹ COPI5 is the fifteenth meeting of the Conference of the Parties (COP) to the Convention on Biological Diversity (CBD), and the CBD is the main international agreement relating to biodiversity.

² The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) defines biodiversity as: "The variability among living organisms from all sources including terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part." This definition is taken from: <https://ipbes.net/glossary/biodiversity>

³ [Q 10](#) (Professor Díaz)

⁴ Hayhow et al, [The State of Nature 2019](#). The State of Nature partnership, (2019)

⁵

The Members' interests are available on our website:
<https://committees.parliament.uk/publications/6788/documents/72143/default/>



targets, the Aichi targets, but these failed to galvanise the action desperately needed. We cannot afford a repeat of this. Greater urgency is needed from the UK Government and all other governments.

We have five principal concerns:

- COP15 must deliver a clear, ambitious and measurable set of targets along with strong mechanisms for implementation, including for monitoring countries' progress towards the targets, if we are to stand a fighting chance of halting biodiversity losses.
- Major disagreements remain which threaten the possibility of success at COP15. The Government should reach out to international partners to promote compromises on these issues, including around funding and digital sequence information. Without international commitments to more biodiversity funding and compromise on other issues, it will be challenging to reach an ambitious agreement and impossible to implement it. We all stand to benefit if success can be achieved through COP15, but if it fails to galvanise the action urgently needed on biodiversity, we will all suffer the consequences.
- Delivering on what is agreed at COP15 will require concerted action from businesses across many sectors, including those involved in agriculture, finance, and international trade. The post-2020 framework must provide a clear role for businesses in tackling biodiversity, and the Government must support the timely development of clear, consistent and robust requirements for businesses to report on their biodiversity impacts. The Government must also fight for concrete outcomes on biodiversity through the FACT Dialogue and trade and environmental sustainability structured discussions (TESSD) at the World Trade Organization. If this decade is to be the one where we turn the tide against biodiversity losses, this cannot be done through the CBD alone.
- Linked to this, translating the Dasgupta Review's findings into policies that embed nature in economic and financial decision-making must be a top priority for HM Treasury and the rest of Government. This will be a mammoth task which has only just begun with the Government's response to the review. The reform of agricultural subsidies through ELMS – just one example of this kind of work – must deliver on the environmental improvements the Government has promised.
- Departments from across government – from FCDO and DIT to MHCLG – will need to be far better aligned and more involved if we are to tackle biodiversity losses. The right machinery of government must be developed to provide the focus necessary to deliver on what is agreed at COP15, and to address biodiversity losses through other international and domestic channels. The Government needs to develop a serious engagement and PR campaign for communicating with the public and all those who have a vital role to play protecting and restoring biodiversity, while maintaining international credibility by showing what an ambitious, overarching target on nature looks like through the Environment Bill.

The critical need to halt biodiversity losses and secure the benefits of protecting and restoring nature has become increasingly apparent to us over the course of this inquiry. There is much more that the Government can and must do to address biodiversity losses



through its work towards an ambitious post-2020 framework as well as pursuing solutions via other international channels.

A summary of the evidence we heard – which underpins this letter and our recommendations – is attached as an appendix, and our 12 recommendations in full are below.

We recommend that the Government should:

1. Continue promoting ambitious targets, alongside strong mechanisms for implementing the post-2020 framework and monitoring countries' progress towards its targets.
2. Increase its diplomatic efforts on the key sticking points ahead of COP15: funding for biodiversity action (the resource mobilisation issue) and digital sequence information. The Government should create opportunities for political progress by stepping up Ministerial engagements on these issues including at events like the IUCN World Conservation Congress and the UN Food Systems Summit, both in September.
3. Seek to ensure the post-2020 framework provides a clear role for businesses, including those involved in agriculture, finance, and who trade internationally, in tackling biodiversity, and support the timely development of clear, consistent and robust requirements for businesses to report on their biodiversity impacts.
4. Accelerate work on translating the Dasgupta Review's findings into policies that embed nature in economic and financial decision-making, and make this a top priority for HM Treasury and the rest of Government. This will be a mammoth task which has only just begun with the Government's response to the review.
5. Ensure that the Environmental Land Management schemes – which could be a positive example of reforming environmentally-harmful agricultural subsidies – live up to expectations as they are rolled out.
6. Recognising the impacts of global trade on biodiversity loss, promote action on biodiversity at the WTO, including through the trade and environmental sustainability structured discussions (TESSD), and seek concrete outcomes from these and the FACT dialogue. Protecting and restoring biodiversity should also be a central consideration in the negotiation of new trade deals, and the Government must report on the effects on biodiversity of any new trade agreement.
7. Make sure the right machinery of government is in place to effectively implement what is agreed at COP15 and give biodiversity the priority it deserves across Government. This could include cross-Government structures to facilitate a strategic approach to biodiversity and ensure that the implications for biodiversity are given a higher weight in all relevant Government decisions.
8. Develop a serious PR campaign to engage the public on biodiversity before and after COP15 – including through a high-profile media campaign like the Scottish Government's net zero media campaign – with messaging that brings home the relevance of COP15 to individuals and communities and highlights the role they can play in protecting and restoring nature more widely.
9. Include an ambitious, overarching state of nature target in the Environment Bill which has the potential to inspire an ambitious headline target in the post-2020 framework. Introducing a weak or ambiguous domestic target would surely send an unhelpful signal ahead of COP15.



10. Enhance coordination between COP26 and COP15, and work to improve relations with China so that progress in this area of common interest can be achieved. The Government should ensure nature is a central focus at COP26. The Government should also seek to build lasting links between the UNFCCC and CBD beyond COP26 and COP15 and make clear the importance of the climate change and biodiversity interface when it hands over the UNFCCC Presidency.
11. Work to re-establish trust with developing country partners, recognising that the failure to ensure global access to COVID vaccines and the Government's cut to ODA has damaged this trust, and that a good outcome at COP15 rests on renewal of that trust. ODA spent on education and good governance can also underpin biodiversity action.
12. Advocate for positive, mutually-beneficial links between biodiversity and development in the post-2020 framework - for example by including social safeguards, like a requirement for full and effective stakeholder participation, in delivering the targets. The Government should also seek in its COP15 negotiating positions to ensure the role played by indigenous peoples and local communities protecting biodiversity is secured by the post-2020 framework.

We are glad to see colleagues in the Environmental Audit Committee (EAC) are also considering issues related to biodiversity.⁶ It is a crucial topic which deserves more attention from policy-makers.

Assuming COP15 remains scheduled for October, we would be grateful for a response by Wednesday 1 September to this letter which covers our five main concerns and the recommendations that refer to action ahead of COP15 (1 to 3, and 8 to 12). We would also appreciate a subsequent response by 5 November on both your assessment of the outcome of COP15 including regarding all of the negotiating issues that we have raised, and the Government's work in relation to the recommendations that refer to action after COP15 (3 to 10). If COP15 is delayed the Committee Clerk will be in touch to revise these dates.

Yours sincerely

Baroness Parminter

Chair, Environment and Climate Change Committee

⁶ <https://committees.parliament.uk/work/448/biodiversity-and-ecosystems/news/>



Appendix: summary of the evidence heard on COP15

What is needed for COP15 to be a success

We heard that the failure of the Aichi targets - which were adopted in 2010 under the Convention on Biological Diversity (CBD) - has shown that agreeing ambitious targets on their own at COP15 will not be enough. Despite the Aichi targets being in place, Professor Sandra Díaz explained that “the global decline of biodiversity we see today is unprecedented in human history”.⁷ Witnesses added that there were not sufficient resources available for work toward the Aichi targets, national implementation was weak, and good monitoring systems and metrics were absent for many of the targets.⁸ These will be important areas to improve upon in the post-2020 Global Biodiversity Framework (‘the post-2020 framework’) that is to be agreed at COP15.

While these are areas for improvement, the ambition of the targets in the post-2020 framework is still under negotiation, and far from guaranteed. Georgina Chandler reflected that the ambition of the targets was yet to be settled.⁹ According to Friedrich Wulf, “there is a strong worry in civil society that the new targets will be weaker than the old ones.”¹⁰

Along with the critical issue of agreeing the ambition of the targets, progress is urgently needed ahead of COP15 on key sticking points including resource mobilisation and digital sequence information.¹¹ Talking about the updated zero draft of the framework, which was the draft available at the time of us gathering evidence,¹² Ms Chandler told us “there really has been no kind of resolution” on resource mobilisation,¹³ and regarding digital sequence information Dr Elsa Tsioumani said: “We should assume that the issue is that controversial that it is not even in the draft at this stage, so that will be a major difficulty”.¹⁴ We were disappointed to see that there was little progress on resource mobilisation in the G7 communique and Nature Compact, and no mention of digital sequence information.¹⁵ Witnesses explained that the interests of different groups of countries are spread across the outstanding issues, so progress is needed across the piece to enable an ambitious agreement to be reached.¹⁶

⁷ [Q 10](#)

⁸ [Q 13](#) (Professor Díaz), [Q 13](#) (Dr Dias)

⁹ [Q 26](#)

¹⁰ [Q 14](#)

¹¹ Resource mobilisation is the part of the draft post-2020 framework covering funding to implement the framework. The issue of digital sequence information refers to arrangements for sharing benefits from genetic resources in light of scientific and technological developments in genetics. On the latter issue more information is available here: <https://post.parliament.uk/research-briefings/post-pn-0630/>

¹² The Co-Chairs of the Open-ended Working Group on the Post-2020 Global Biodiversity Framework had published a ‘zero draft’ and ‘updated zero draft’ of the post-2020 framework at the time of us gathering evidence. A new draft of the post-2020 framework, the ‘first draft’, was published on 12 July and we refer to its implications below.

¹³ [Q 26](#)

¹⁴ [Q 26](#)

¹⁵ <https://www.gov.uk/government/publications/g7-climate-and-environment-ministers-meeting-may-2021-communiqué/g7-climate-and-environment-ministers-communiqué-london-21-may-2021> and

<https://www.g7uk.org/wp-content/uploads/2021/06/G7-2030-Nature-Compact-PDF-120KB-4-pages.pdf>

¹⁶ [Q 30](#) (Ms Chandler), [Q 30](#) (Dr Tsioumani)



A new draft of the post-2020 framework, the ‘first draft’, was published by the Co-Chairs of the Open-ended Working Group on 12 July. This contains potential advances on some of these issues but not others, and it is not yet clear how the countries who are parties to the CBD will respond to it. Dr Tsioumani raised countries’ ownership of the draft as a challenge in the context of the ‘updated zero draft’ available at the time of us gathering evidence, which she said was “far from a negotiating draft” and “not a draft owned by the parties and the other participants”.¹⁷ We hope advances made in the first draft are welcomed by the parties, but this will not be clear until the next working group meeting in August, or indeed until COP15 itself.

A key theme emerged in our hearings that for the package agreed at COP15 to be delivered successfully, further action will be required through other international channels. Dr Braulio Ferreira de Souza Dias told us other biodiversity and environment-related conventions need to support whatever is agreed at COP15, and that “it should go beyond the environment agreements and environment bodies, to trade, finance, energy, transportation, et cetera”.¹⁸ Witnesses also referred to benefits that could be gained from promoting better links between biodiversity and climate change and development but said there is a need to manage the links carefully to minimise trade-offs between the different agendas.

Regarding biodiversity and trade, Professor Díaz told us: “[World Trade Organization (WTO)] trade legislation and regulation have a huge impact on what does and does not get done, and what is good business and therefore gets done and what suddenly becomes bad business and is not done any more ... that is the place where most of the action has to be.”¹⁹ Soledad Leal Campos identified avenues through which negative impacts of trade on biodiversity could be reduced without losing trade's benefits, including by agreeing to reduce and eliminate environmentally-harmful subsidies (the WTO is often the appropriate forum for this), linking the COP26 FACT dialogue²⁰ with the Trade and Environmental Sustainability structured discussions (TESSD)²¹ at the WTO, and exploring different approaches to biodiversity in bilateral trade agreements.²² In addition to Soledad Leal Campos, several other witnesses said that reducing and eliminating environmentally-harmful subsidies will be key to deliver on what is agreed at COP15, with the ongoing WTO negotiations on fisheries subsidies being one opportunity to address this issue.²³

More widely, we heard that embedding nature in economic and financial decision-making in the UK and elsewhere will be crucial if biodiversity losses are to be halted, and that businesses, including those involved in agriculture, finance, and who trade internationally, have a key role to play. Dr Dias welcomed the Dasgupta Review as a “major contribution

¹⁷ [Q 26](#)

¹⁸ [Q 15](#)

¹⁹ [Q 12](#)

²⁰ The Forest, Agriculture and Commodity Trade (FACT) Dialogue was launched by the Government as part of its COP26 efforts, and includes producer and consumer countries aiming towards more sustainable food supply chains with a specific focus on the link between agricultural commodities and deforestation.

²¹ At the WTO, fifty members, including the UK, launched the Trade and Environmental Sustainability structured discussions (TESSD) in November last year. Proponents describe the discussions as an “effort to enhance environmental sustainability in international trade”. More information is available here: <https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/WT/CTE/W249.pdf&Open=True>

²² [Q 52](#)

²³ [Q 11](#) (Dr Dias), [Q 12](#) (Professor Díaz), [Q 33](#) (Dr Tsioumani), [Q 46](#) (Mr Cooper)



from the UK" and suggested it should now be built on by considering "economic mechanisms, incentives, and the whole issue of the metrics of biodiversity".²⁴ On businesses' role specifically he added: "There is a lot of work going on to measure biodiversity for the business community. I hope that will develop into more unified standards for the business community to comply with, but we need pressure from Governments to see that happening."²⁵ Akanksha Khatri similarly suggested there should be a consistent requirement for businesses to report on their environmental footprint,²⁶ while Melissa Miners told us clear direction from governments could put biodiversity "at the forefront of the mind of shareholders and consumers".²⁷

David Cooper described biodiversity and climate change as "inseparable", adding "those issues will succeed or fail together". He also emphasised: "We have to be careful that the way we take action to mitigate climate change does not have undue negative impacts on biodiversity, whether through the siting of wind farms or hydroelectric, and, above all, through biomass and bioenergy."²⁸ Bernadette Fischler Hooper said the Government has a unique opportunity as COP26 President to improve the relationship between the United Nations Framework Convention on Climate Change (UNFCCC) and CBD, which at times have tackled their respective issues in silos.²⁹ However in a session on the Chinese Presidency of COP15 we heard from Minister Yang that despite a recognition of "close links between these two important conferences", poor bilateral relations between the UK and China are limiting cooperation on COP15 and COP26: "Unfortunately, our bilateral relations are not good enough for our working people to carry out more practical co-operation."³⁰

Turning to links with development, Dilys Roe argued that "development issues are not embedded systematically throughout the [updated zero draft of the post-2020] framework", both regarding the potential of biodiversity for delivering sustainable development and the risks of biodiversity conservation to development.³¹ She said social safeguards were needed especially for the 30by30 target³² and nature-based solutions³³ - for example by requiring full and effective participation of all stakeholders in delivering those targets - otherwise communities could be displaced from land in the process.³⁴

²⁴ [Q 14](#)

²⁵ [Q 13](#)

²⁶ [Q 23](#)

²⁷ [Q 23](#)

²⁸ [Q 46](#)

²⁹ [Q 46](#)

³⁰ [Q 44](#)

³¹ [Q 49](#)

³² The '30by30' target, which the Government has been promoting, is to conserve or protect at least 30 percent of global land and global ocean by 2030.

³³ The term 'nature-based solutions' was in previous drafts of the post-2020 framework. It is not in the latest draft but there is a corresponding target which refers to contributing to climate change mitigation and adaptation. Nature-based solutions are defined by the International Union for Conservation of Nature as "actions to protect, sustainably manage, and restore natural or modified ecosystems, that address societal challenges effectively and adaptively, simultaneously providing human well-being and biodiversity benefits". This definition is taken from: <https://www.iucn.org/theme/nature-based-solutions>

³⁴ [Q 50](#)



Indigenous peoples and local communities make a contribution to protecting biodiversity, acting, in Dr Tsioumani's words, as "the stewards of global biodiversity",³⁵ but we heard that earlier drafts of the post-2020 framework could do more to secure this role. Akanksha Khatri noted that indigenous communities are responsible for managing a significant proportion of the Earth's natural capital,³⁶ and Dilys Roe explained that indigenous peoples and local communities "quite often ... suffer from incredibly poor land rights, and are unable to defend their land and continue to manage the biodiversity on it".³⁷

Wider Government policy could also affect the negotiations. Dr Tsioumani explained that vaccine distribution, which "is probably the main global challenge ... affects the trust in the negotiations and whether developing countries perceive the UK's position, or other developed countries' positions, as being in good faith".³⁸ Soledad Leal Campos said "resource mobilisation, including ODA [Official Development Assistance], is crucial to help the countries meet the targets",³⁹ and Mr Cooper drew another link to the Government's ODA cuts: "Without more equality, without investment in girls' and women's education, and without building institutions, we will not have the enabling environment to be able to address biodiversity loss ... One thing the UK must do is reverse the cuts in ODA."⁴⁰

What we have learnt

The Government has made some positive contributions towards COP15 preparations and to addressing biodiversity issues in the climate change policy field. Ms Chandler told us the Government should be commended for its work on the implementation and transparency discussions, which will be central to the effective delivery of the post-2020 framework.⁴¹ Witnesses noted the Government's emphasis on nature as part of COP26, and stressed the importance of continuing and deepening this link.⁴²

Increased engagement with the public on biodiversity and nature will be vital both ahead of COP15 and after the event. Akanksha Khatri told us: "I sincerely hope that government representatives take it upon themselves to translate some of the highly technical and complex language on nature in a way that citizens can understand, so that they recognise that they have a role to play and that A, B and C are the different actions that they need to take."⁴³ Several witnesses recommended using high levels of public awareness about climate change as an entry route for emphasising the wider importance of nature and biodiversity, as the Government's nature focus in COP26 begins to do.⁴⁴ Given how important public engagement will be for addressing climate change and other environmental challenges, we intend to hold an inquiry on the topic later this year.

³⁵ [Q 16](#)

³⁶ [Q 16](#)

³⁷ [Q 50](#)

³⁸ [Q 32](#)

³⁹ [Q 52](#)

⁴⁰ [Q 53](#)

⁴¹ [Q 27](#)

⁴² [Q 19](#) (Melissa Miners), [Q 27](#) (Melissa Miners), [Q 46](#) (Bernadette Fischler Hooper)

⁴³ [Q 19](#)

⁴⁴ [Q 19](#) (Melissa Miners), [Q 20](#) (Ms Chandler), [Q 46](#) (Bernadette Fischler Hooper)



Witnesses also told us businesses and civil society are keen to be engaged ahead of COP15 and after the event, and that clarity and certainty on how the post-2020 framework translates across sectors is critical for them, with common metrics for the post-2020 framework being a part of this.⁴⁵ Melissa Miners emphasised that the framework needs to "clearly articulate ... the role that businesses can and must play", and said this could be helped by governments prioritising the development of a common measurement framework.⁴⁶ She also mentioned the Business for Nature coalition, with a membership of 530 companies, as a good route for government engagement.⁴⁷

Witnesses were clear that there remain some key opportunities for the UK to show leadership through domestic policies, and this could help inspire an ambitious agreement. In the last decade countries introduced national targets to implement the Aichi targets which were in general much weaker than the global targets.⁴⁸ Looking forward, Ms Chandler referred to the state of nature amendment - which would establish a requirement in the Environment Bill for an overarching state of nature target - as "a real opportunity to demonstrate tangible action that means something in practice".⁴⁹ She said through this and other measures the Environment Bill could set an example globally, but added that the UK needs "to go to the next step to show that we are truly world-leading".⁵⁰

Domestic policies will also be the vehicle for implementing significant parts of the framework agreed at COP15. Dr Dias highlighted that the Aichi targets and their implementation gave insufficient attention to mainstreaming biodiversity, and added: "The tradition has been for all sectors in government to leave environment ministries to deal with the implementation of the Aichi targets, but the environment ministries are not the ones causing the problems."⁵¹ The Environment Bill's policy statement on the environmental principles could be a powerful tool for mainstreaming environmental concerns, including biodiversity, across Government. However, as we discussed with you in our recent evidence session on COP15, the reach of the draft policy statement is limited as it gives key departments, HM Treasury and the Ministry of Defence, exemptions from the requirement to give due regard to the environmental principles.⁵²

⁴⁵ [Q 20](#), (Melissa Miners), [Q 19](#) (Ms Chandler)

⁴⁶ [Q 16](#)

⁴⁷ [Q 20](#)

⁴⁸ [Q 13](#) (Dr Dias)

⁴⁹ [Q 20](#)

⁵⁰ [Q 32](#)

⁵¹ [Q 13](#)

⁵² [Q 59](#) (this transcript was uncorrected at the time of writing)