

Written submission, Friedrich Wulf, International Nature Campaigner, Friends of the Earth Europe and Paul de Zylva, Friends of the Earth England, Wales and Northern Ireland - IBC0002

Additions to the statements of Friedrich Wulf at the House of Lords Environment and Climate Change Committee's session on COP15: learning from the Aichi targets, Tuesday 15 June 2021, 11.15am, regarding questions 14 and 15

### **Additional points to Question 14**

*Q 14: Lord Browne of Ladyton asked: Where do Governments, but especially the United Kingdom Government, need to adjust their positions and related policies and resources to ensure an effective post-2020 framework from COP15, one that can be agreed and implemented.? You probably have a number of recommendations, but if you have a favourite one, if there is an ultimate priority, tell us what that priority is because that will really help us.*

1. I focussed on the need to improve implementation and related mechanisms in the CBD, through standardised reporting, reviewing and a whole of government approach.
2. However, I would have also liked to mention that the new GBF so far has failed to implement the CBD's obligations concerning states' impact on the biodiversity of other states, including biodiversity:
3. **"A major gap is the non-implementation of CBD articles on the impacts of national policies on the biodiversity of other countries (telecoupling etc., consumption – not just cross-border effects):**
  - a. **Art. 3:** states have the responsibility to ensure that activities within their jurisdiction or control **do not cause damage** to the environment of other states...
  - b. Art. 4 b: **the provisions of this convention apply** [...] in the case of processes and activities, carried out under its jurisdiction or control, **within the area of its national jurisdiction or beyond the limits of national jurisdiction**
  - c. **Art. 8I: Each contracting party shall**, as far as possible and as appropriate, where a significant adverse effect on biological diversity has been determined, **regulate or manage the relevant processes and categories of activities**
4. I voiced the concern that the upcoming global biodiversity framework might be weaker and less ambitious than the current

Aichi targets, a concern reflected by Dr Braulio Ferreira de Souza Dias. Here are some details where we feel this is the case in the updated zero draft to the Global Biodiversity framework:

- a. **There currently is no target on ecosystems or forests.**
  - b. **Draft target t2 on protected areas does not mention equity and does not have an indicator on Human Rights.**
  - c. **Several targets related to "meeting peoples' needs" are putting benefits and productivity first rather than sustainability in targets related to sustainable use (draft targets 8, 9, 12) – for comparison, here are the current Aichi targets on these issues:**
    - i. Aichi 7; By 2020 areas under agriculture, aquaculture and forestry are managed sustainably, ensuring conservation of biodiversity.
    - ii. Aichi 8: By 2020, pollution, including from excess nutrients, has been brought to levels that are not detrimental to ecosystem function and biodiversity.
5. Target 9 and other targets **contain %values related to now** ("reducing productivity gaps by at least [50%.]") **instead of thresholds which should be achieved.**
6. In draft target 15, **demands regarding consumption are only directed at consumers**, not parties/states.
7. In target 17, only "**most**" incentives harmful to Biodiversity must be tackled **instead of all.**
8. According to draft target 18, Finance should increase by x% - we think it must be **commensurate with the ambition of the goals and targets of the framework (t18) –**
9. The IPBES global assessment highlights that IPLCs have a key role to play – **there is a need to mention full and effective participation, UNDRIP and FPIC, as well as rights of women and youth**; draft target 20 currently lacks this.
10. I did also not make concrete points on what that means for the UK's national policies. My Colleagues at Friends of the Earth England, Wales and Northern Ireland gave me the following perspective:  
"The **lack of implementation of past agreements** on biodiversity is **THE** main reason for the state of nature, biodiversity and ecosystems. That was the case with the failure to hit the original pledges to stop, reverse and restore biodiversity by 2010. The biodiversity aims were re-cast to 2020 and we are now looking at what action is needed to

make up for past failure and to act as never before in the decade to come.

The basic failure to implement what government (and businesses) agreed to do is why we are still discussing this. It is not especially a mystery. **The government's Biodiversity 2020 plan was never really on track, and if it was, it went off track quite quickly.** As early as 2012 conservation NGOs pointed out how **Biodiversity 2020 was not on track** – see Wildlife and Countryside Link paper:

[https://www.wcl.org.uk/docs/Link response to the APPG Biodiversity inquiry into the NEWP and B2020 Dec12.pdf](https://www.wcl.org.uk/docs/Link_response_to_the_APPG_Biodiversity_inquiry_into_the_NEWP_and_B2020_Dec12.pdf)

And in 2020, the RSPB referred to the '**Lost Decade for Nature**':

[https://ww2.rspb.org.uk/Images/A%20LOST%20DECADE%20FOR%20NATURE\\_tcm9-481563.pdf](https://ww2.rspb.org.uk/Images/A%20LOST%20DECADE%20FOR%20NATURE_tcm9-481563.pdf)

**Given past failures, the question must be asked: What will be different this time?** Questions arise from whether these matters are being properly and fully addressed **across the whole of government, not just left to the environment ministry and its agencies.**

It not unusual for government to announce that a policy is owned by the whole of government before departments go back to doing 'their own thing'.

There seems to be a lot more understanding across UK government departments (business, housing, transport, Treasury) about their role in and contributions on climate change. That is less clear or apparent at present with regard to nature, biodiversity and ecosystems. (One department of state that does seem to take biodiversity seriously is the Ministry of Defence).

The lasting effects of **cuts on the government's statutory agencies ('arm's length bodies') and their ability to act** is part of the issue. In England, for example, the *Environment Agency* and *Natural England*, have been depleted over time. The effects of the loss of budget, staffing expertise and capacity is widely recognised.

The effects on the ground include being unable to properly carry out pollution monitoring and enforcement or to fully advise local authorities and others on flood risk matters and improving conditions for the biodiversity. Similar concerns exist for the resourcing of national bodies such as *Nature Scot* in Scotland and *Natural Resources Wales*.

And at local authority level, **local councils are also far from where they were in terms of having proper in-house ecological expertise** to advise on what is needed in their area to contribute to national aims. The Association of Local Government Ecologists (ALGE) has previously reported on the loss of in-house ecological expertise at local authority and an update on that is due soon.

On another note, there is a Need to transfer Natura 2000 to the Emerald network (under the Bern Convention)."

### **Additional points to Question 15**

*Q 15. Baroness Chalker of Wallasey asked: How should international avenues beyond the CBD address biodiversity losses, and how can the UK Government continue to contribute to that?*

Here are some more details in addition to the statements made by Professor Sandra Díaz, Dr Braulio Ferreira de Souza Dias and me:

11. **The links to the climate** (and the UNFCCC) matter because climate and biodiversity are linked both in the positive and in the negative. For example:
  - a. In good condition, nature and ecosystems can help build resilience to disruptive weather expected with a changing climate.
  - b. But degraded soils and peatlands and damaged seas can add to climate change by releasing more carbon or failing to store enough.
12. The joint work of the IPCC and the IPBES underlines this and confirms what we at Friends of the Earth has said for some time about the need to address both sides of the equation. Importantly, the report also underlines that not all "nature-based solutions" that work for climate also work for biodiversity – for example, monoculture tree plantations with IAS may help to sequester carbon, but they are detrimental for biodiversity, and that is therefore imperative to ensure any projects or mechanisms serve both climate and biodiversity equally.
13. **How biodiversity is reflected in the Sustainable Development Goals** (SDGs) also matters.
14. The SDGs matter because they bring together aims on nature (biodiversity), climate and human development as never before, and that integration is helpful for better forms of governance, cooperation across government departments and efficient use of resources in tackling problems.

15. There is a need to maintain SDG 15 and its targets, extend until 2030.
16. **The role of the UK as a major economy, a base for business and finance** is also crucial here because money and investments need to be directed in the right ways.
17. For example:
  - a. **Trade policies matter** and have implications for biodiversity, as they do for climate. Will the trade deals the UK seeks to strike be in keeping with nature and climate aims, or will they, in effect, undermine those?
  - b. **Flows of finance are important** to reduce risks to financial markets and business from the decline or even collapse of nature. Take for example the risk profile of businesses whose commodities depend on healthy populations of pollinating insects and mammals.
18. The **UK's well established and respected academic, research, biological and scientific base also has a role to play** such as in knowledge transfer and the role of the UK's many expert institutions, research base and scientific and conservation experience.