



The path to recovery: Restoring nature at home and at COP15

Zero Hour briefing on CBD COP15

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Background

Human civilization depends on a healthy and diverse natural environment in order to survive and flourish.¹ However, the economic, institutional and social structures that predominate in countries such as the UK are fundamentally destabilising natural systems and pushing the planet beyond the safe operating space for humanity on Earth.

Against this backdrop, the UK Government can help to deliver a transformative outcome at COP15 in Kunming, China later this year. COP15 is the fifteenth meeting of the Conference of the Parties to the UN Convention on Biological Diversity (CBD). These biannual conferences are connected to, but distinct from, the annual COPs of the UN Framework Convention on Climate Change (UNFCCC)—the most recent of which, COP26, was held in Glasgow in November 2021.²

This briefing sets out a number of proposals for the post-2020 Global Biodiversity Framework (GBF) which is set to be adopted at COP15.³ The GBF is seen as a ‘Paris Agreement for nature’ and a means of rallying all countries around a clear set of ambitious and measurable goals for nature. While the [first draft GBF published in July 2021](#) contains steps in the right direction, it currently fails to address the root causes of the climate and nature crisis. Many of its proposed goals, milestones and targets remain woefully unspecific, leaving room for inaction and the continuation of destructive practices.

If adopted in its current form, the world’s governments will miss a vital opportunity to steer the planet towards a future where nature and people can thrive together. The Parties meeting in Kunming should learn from the mistakes of the [previous ten-year UN biodiversity plan](#) adopted at COP10 in Aichi in 2010, since the world has [not fully met any of the 20 targets adopted](#). According to the UK Government’s own performance assessment, the [UK also failed in its contribution to the goals agreed in 2010](#). Many of the principles featured in the first draft GBF were already part of the Aichi targets—this time around, it is therefore essential that Parties commit themselves to clear and accountable measures, moving beyond paying lip service, and delivering transformative action.

- For each of our proposals for the GBF, we also outline corresponding action that should be taken at UK level.
- Many of these are contained within or enabled by the [Climate and Ecological Emergency \(CEE\) Bill](#), which is currently before the House of Commons and is supported by [over 150 MPs and Peers representing all major political parties](#).
- The CEE Bill creates an ambitious framework for action that aligns UK policy with international climate and nature targets.
- It also provides the UK Parliament and UK Government with an opportunity to demonstrate global leadership in tackling the climate-nature crisis.

¹ Evidence of the widespread destruction of the natural world is overwhelming. With rates of extinction now reaching [1,000 times the natural rate](#) and [1 million plant and animal species](#) at risk of disappearing, the threat to the planet’s ecosystems, on which [human civilization depends](#), is considerable and imminent. ² Both conventions were agreed at the Earth Summit in Rio in 1992 (along with a third accord, the UN Convention to Combat Desertification). COP15 is currently set to take place in the third quarter of 2022 having been delayed several times due to the COVID-19 pandemic.

³ The Zero Hour campaign has produced this briefing with the support of scientists and academics from the UK and around the world. Its proposals are shaped by their combined expertise in the ecological sciences, as well as their acute understanding of the depth and urgency of the crisis. Comments were also gratefully received from The Wildlife Trusts and Wildlife & Countryside Link.

Zero Hour's COP15 proposals—in brief

The Prime Minister is to be commended on signing the [Leaders' Pledge for Nature](#), a global commitment to reversing biodiversity loss by 2030. The UK Government can now play a leading role in ensuring this—and other nature positive commitments—are enshrined in the GBF. The GBF must:

1. **Take joined-up action on the planetary emergency.** Protecting and restoring the natural world can contribute to climate change mitigation, but nature-based solutions must not be used to offset business-as-usual emissions.
2. **Address the root causes of the destruction of nature**, including unsustainable and unaccountable patterns of consumption and land use.
3. **Deliver a global goal (or mission) to halt and reverse biodiversity loss by 2030** against a baseline of 2020.
4. **Use people-centred conservation targets that focus on quality over quantity.** Approaches such as '30x30' must not detract from addressing root causes and must only be used in combination with initiatives targeted at nature-depleted areas where people live.
5. **Include a robust implementation plan, reporting framework and adequate finance for Global South countries.** Responsibility for implementation must be mainstreamed across all government bodies and all sectors of society.



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Overview and development of the draft Global Biodiversity Framework

The [first draft GBF](#) is based on a theory of change which calls for urgent policy action and the transformation of economic, social and financial models in order to stabilise biodiversity by 2030 and enable ecosystem recovery by 2050. This theory of change is operationalised through a hierarchy of aims:

- **A vision of a world living in harmony with nature by 2050.** This vision is carried over from the Convention on Biological Diversity's [Strategic Plan for Biodiversity 2011-20](#).
- **A mission to put nature on a “path to recovery” by 2030.** The mission is sometimes known

as the “global goal” for nature. It is the headline aim within the GBF and corresponds to the 1.5°C target in the Paris Agreement (see proposal 3, below).

- **Four goals for 2050** relating to ecosystem integrity, species extinctions and genetic diversity; nature’s contributions to people; the use of genetic resources; and the finance gap.
- **Two or three milestones for 2030** under each of the four goals in order to track progress.
- **21 action targets for 2030**; the logic being that if transformative work begins on these targets immediately, they will—taken together—lead to the achievement of the 2030 milestones and put the world on course for meeting the 2050 goals.

The current plan is for the GBF to be adopted along with a monitoring framework and headline indicators.

The GBF has been in development since 2019. A final meeting of the working group tasked with developing it is taking place in Geneva from 13 to 29 March 2022⁴. Parties are expected to negotiate their positions and produce a final draft GBF to be forwarded to COP15 for further negotiations and adoption in Kunming.



⁴ The CBD subsidiary bodies on implementation and scientific/technical advice (SBI and SBSTTA) are also meeting at the same time in Geneva.

Zero Hour’s COP15 proposals—in detail

1. Taking joined-up action on the planetary emergency

Dramatic changes to the climate and in the natural world are interwoven elements of an overarching planetary emergency driven by unsustainable human activity.⁵ According to the Stockholm Resilience Centre, we have now **breached five of the nine planetary boundaries** that enable a safe operating space for humanity.⁶ Crossing these thresholds will have knock on effects, because disrupting one boundary often leads to the disruption of others. To give one example, land-clearing can lead to the destruction of ecosystems and increased carbon emissions. This exacerbates climate change and ocean acidification and, in turn, further impacts ecosystems.

It is therefore essential that decisions taken at the highest level of international governance recognise these interconnections—otherwise the solutions devised for one area risk backfiring in another. As noted by the [House of Lords Environment and Climate Change Committee](#), the biodiversity and climate COPs should coordinate their efforts. June 2021 saw the publication of [the first joint report](#) between the UN’s climate and biodiversity expert panels—the IPCC and IPBES. Their conclusions are an urgent rallying call to policymakers for joined-up action: “Ignoring the inseparable nature of climate, biodiversity, and human quality of life will result in non-optimal solutions to either crisis.” Furthermore, the [most recent IPCC report from February 2022](#) placed the strongest emphasis yet on the interactions between climate, ecosystems and human society.⁷

- *GBF action*

Parties must ensure that ecosystem-based approaches—sometimes known as nature-based solutions—are used only on the precondition of rapid reductions in emissions. The focus should be on protecting biodiversity, rather than offsetting continued exploitation of fossil fuels. Mass monocultural afforestation and bioenergy plantations must be explicitly excluded as potential ecosystem-based approaches as they are detrimental to biodiversity and people.

It is also essential that Indigenous Peoples and local communities (IPLCs) are not dispossessed of their lands as part of these solutions. Finally, national biodiversity strategies and action plans (NBSAPs) and nationally determined contributions (NDCs) must be fully aligned with each other in order to amplify positive outcomes for nature, climate and people.⁸

- *Domestic action*

UK Government policy should be designed for joined-up action to protect and restore ecosystems that contain the UK’s crucial carbon sinks, including forests, peatlands, wetlands and the ocean—as emphasised in the [Glasgow Climate Pact](#). Climate change is now one of the direct drivers of biodiversity loss. Limiting global heating to [1.5°C is therefore essential](#) in attaining any ambitious goals for biodiversity in the UK and globally.

Overfishing in UK waters is destroying biodiversity and, in so doing, is releasing carbon dioxide—as well as destroying the ocean’s [ability to store more carbon](#). These ecosystems are also some of the richest in biodiversity; protection and restoration will therefore build resilience within them to climate change.

A [UN report released in May 2021](#) shows that our best chance of limiting warming to 1.5°C is by sharp, swift methane reduction. The CCC has factored reduction in meat and dairy into the [6th Carbon Budget](#), with a ‘20% shift away from meat and dairy products by 2030, and a further 15% reduction by 2050’. The plan factors in land use change to reduce emissions, particularly of methane and nitrous oxide, and restoration of biodiversity. In November 2021 the Government

⁵ The multifaceted nature of the planetary emergency we are facing is increasingly being recognised by public institutions, scientists and thought leaders including the [Natural History Museum](#), [Club of Rome](#) and [126 Nobel Prize laureates](#).

⁶ These are climate change, biogeochemical flows, land-system change, biosphere integrity and novel entities (environmental pollutants including plastics). For more on the planetary boundaries, see [this recent documentary](#) featuring Sir David Attenborough and Prof. Johan Rockström.

⁷ See Figure SPM.1 on page 6 of the report for an illustration of the interactions.

⁸ NBSAPs are the biodiversity equivalent of NDCs in the climate space.

signed up to the [Global Methane Pledge](#) to reduce methane emissions by at least 30% from 2020 levels, by 2030. But the Environmental Land Management Schemes (ELMs), that will cover over 70% of UK land, make no mention of a plan to reduce livestock production, to reduce emissions, and release land for biodiversity. To be effective, actions must be joined-up and coordinated across all Government departments, sectors, local authorities and landscapes.

The [Climate and Ecological Emergency \(CEE\) Bill](#) provides a framework for joined-up action on the dual climate-nature crisis in a way that explicitly aligns with high-level international goals.

2. Tackling the root causes of the destruction of nature

The destruction of nature is driven by unsustainable and growing levels of consumption and a

lack of accountability at a global level. Meaningful policy discourse around these connections is often hindered by the foregrounding of ideological differences. However, the connection between our current patterns of consumption and environmental degradation is based not on ideology, but on the weight of empirical evidence. For example, there is now overwhelming evidence that the meat and dairy industries are amongst the key drivers of [carbon emissions and environmental degradation](#).

The amount of land projected to be taken up by [livestock production](#) by 2050 is in danger of cancelling out the “increase of at least 15% in the area” of land required to enhance the integrity of all ecosystems by 2050 (see, the current Goal A in the draft GBF). However, as the [recent Dasgupta Review](#) notes, “estimates suggest that if diets shifted away from animal products, it would be possible to feed the world’s present population with as little as 50% of current agricultural land.” What’s more, the lack of international governance means that people in richer countries, like the UK, are able to consume large amounts of goods and services via globalised supply chains—and ‘export’ impacts on nature elsewhere—with little to no accountability for the resulting degradation of ecosystems around the world. Global disparities in financial and natural wealth, as well as past, present and future impacts on nature, are currently not considered in the draft GBF.

- *GBF action*

The goals, targets and milestones must flow from an explicit acknowledgement of the root causes of the climate-nature crisis. In the current draft theory of change in the GBF, for example, there is a call for urgent policy action to “transform economic, social and financial models so that the trends that have exacerbated biodiversity loss will stabilise in the next 10 years”. However, the text does not specify what those trends are, namely, the unsustainable economic and societal production and consumption practices that have driven nature to its current state. These must now be transformed to circular or zero impact models.

In the GBF, the Parties must commit to taking responsibility for their entire ecological footprint, and not just their impact on nature within their own borders. This commitment should be included in the wording of the GBF mission, underscored within targets 10, 15 and 16 (on sustainable management of production systems, private sector obligations, and waste and overconsumption), and reflected in the implementation framework under “responsibility and transparency”. In addition, target 16 should be reworded to place the burden of responsibility for waste and overconsumption on governments and producers, rather than on citizens.

The *Mitigation and Conservation Hierarchy* outlines an approach for [differentiated pathways towards a common goal](#), in which financially wealthy but nature-poor countries (including the UK) may have limited opportunities to prevent degradation and protect biodiversity on their own land, but may have resources to commit to ambitious net gain targets. Under these targets, financial resources can be invested in protection and restoration elsewhere in order to compensate for current and past impacts on nature via global supply chains. This can be seen as analogous to nationally determined contributions (NDCs) under the Paris Agreement and growing commitments by countries and institutions to become “climate positive”.

- *Domestic action*

In the UK, key drivers of biodiversity loss are habitat destruction caused by land and sea use change, as well as chemical pollution. This is often blamed on the agriculture and fishing industries, but they are responding to demand driven by the UK’s unsustainable patterns of

production and consumption. [Demand for meat products](#) and ultra-processed foods are key. 70% of UK land is agricultural and more than 65% of that is used for the production of livestock—pasture and crops for animal feed—leaving little room for nature.⁹ The UK has a huge ecological footprint, domestically and globally. The WWF reports that the UK “must [reduce its global footprint](#) by three quarters by 2030 to meet planetary limits.” At the same, there are significant opportunities for a [Nature Positive Economy](#).

The ambition to halt and reverse biodiversity loss by 2030 require a whole-of-government approach, developed in consultation with industry, civil society and communities. This type of approach was [recently called for by food industry market leaders](#); giving evidence to the Environmental Audit Committee, they said: “The UK’s food strategy cannot be left to the market”. The Joint Nature Conservation Committee (JNCC) has been commissioned by the UK Government

to [develop an indicator tool to help determine the UK's global ecological footprint](#).

The Environmental Audit Committee has recommended that the Government launches a [consultation](#) ahead of COP15 on how best to model the overseas ecological impacts of UK consumption—and how to implement reduction. Based on this consultation, the UK Government can then set global targets and apply the JNCC tool. The UK should take responsibility for the adverse impacts of UK-generated cycles of consumption, trade, financing and production on terrestrial and marine ecosystems—in the UK and around the world—including the extraction of water and raw materials, deforestation, land degradation, pollution and waste production.¹⁰

3. Halting and reversing biodiversity loss by 2030 against a baseline of 2020

The vision of a “nature positive” future—a world where humans live in harmony with nature—is shared across the UK Government and civil society. It is the title of a [recent report](#) by the Joint Nature Conservation Committee (JNCC) and a [commitment made by the UK Government](#) in response to the *Dasgupta Review*. However, by definition, nature positivity is only possible if we not only halt the destruction of the natural world, but also reverse it.

Currently, the mission (or global goal) in the first draft GBF talks vaguely of putting biodiversity on a “path to recovery” by 2030. This represents a climbdown from the ambitions in the [Leaders' Pledge for Nature](#) to reverse biodiversity loss by 2030, which was signed by the heads of state and government of 88 countries—including the UK Prime Minister—in September 2020.¹¹ The GBF also references “stabilising” biodiversity loss, a term which is open to wide interpretation; it could even be taken to mean a more stable rate of decline.¹² In addition, the goal currently does not include a baseline, which means it is not possible to measure whether the decline in the state of nature has been reversed.

- *GBF action*

The GBF mission must aim to achieve a nature positive outcome by “halting and reversing the destruction of nature by 2030 against a baseline of 2020”. This means that by the end of the decade there must be more biodiversity than there was at the start across all of its elements, including ecosystems, species and genetic diversity, and in nature's contributions to people. It is important to note that the exact date of the baseline is open for debate and that 2020 represents a compromise.

A more ambitious baseline date of, for instance, 1970—i.e. restoring biodiversity to levels last seen in 1970—is not realistically achievable by 2030. A less ambitious baseline of, for example, 2029—i.e. biodiversity would start to improve by 2030 based on levels from the previous year—would disincentivise immediate action and mean that the destruction of nature could continue and even accelerate through to 2029.

⁹ Henry Dimbleby's [National Food Strategy](#), commissioned by the UK Government, shows the need for reduction in livestock and meat eating to halt biodiversity loss, reduce emissions and reverse the trend of obesity and diet-related disease

¹⁰ [Dasgupta on waste](#): “To reduce the land footprint, for example, policies need to aim to reduce animal product waste because 60% of the land footprint of food loss and waste is for livestock production.” ¹¹It is also less ambitious than the G7 [2030 Nature Compact](#), which also commits its signatories, including the UK, to halting and reversing biodiversity loss by the end of this decade.

¹² Footnote 8 of the first draft GBF refers to a “stabilisation in the rate of loss of biodiversity”.

- *Domestic level*

The [Environment Act 2021](#) commits to halting biodiversity loss by 2030 but the Government has signed up to the [Leaders' Pledge for Nature](#), with a commitment to both *halt and reverse* biodiversity loss by 2030. The Act currently includes a target for species abundance and there are requirements for ‘biodiversity net gain’ (BNG) for planning applications and significant infrastructure projects. But irreplaceable ancient and species-rich sites for biodiversity are still [at risk of destruction](#) from development.

The idea of ‘biodiversity net gain’ implies offsetting of habitats, and the Defra metric used to make ecological assessments of sites and species appears [unfit for purpose](#). The University of

Kent recently led an [assessment of 6%](#) of England's house building and other infrastructure projects, carried out by six councils applying the BNG metric from January 2020 to February 2021. The results show a 34% reduction in habitats. The Environmental Audit Committee proposes moving to the more holistic system of [environmental net gain](#). They suggest that the idea of biodiversity net gain is flawed because it ignores the wider benefits that healthy ecosystems provide such as climate mitigation/adaptation, and improved water/air quality.

The Government's environmental target should be holistic, in line with the [Leaders' Pledge for Nature](#), and include "increasing the health, abundance, diversity and resilience of species, populations, habitats and ecosystems so that by 2030 nature is visibly and measurably on the path of recovery" (see, [section 1\(2\)\(b\) of the CEE Bill](#)). The Environment Act policy on forests should be strengthened to ban deforestation of primary forests so that UK supply chains instead only use resources from sustainably managed forests.

4. Use people-centred conservation targets that focus on quality over quantity

Under Target 3, the first draft GBF calls for the conservation of at least 30% of land and sea areas globally by 2030.¹³ This is known as the '30x30' target and is prominently championed by the UK as part of the [High Ambition Coalition for Nature and People](#). Area-based conservation can play a role in galvanising efforts to preserve and restore nature. However, used in isolation—and with a focus on [quantity over quality](#)—this approach poses considerable risks. The practice of conservation has evolved considerably over the past decades, and it is essential that future measures avoid the crudeness of past approaches.

A 2020 [article in Nature](#) found that the expansion of protected areas by the world's governments since 2010, driven by the previous ten-year UN biodiversity plan—the [Aichi Biodiversity Targets](#)—had limited success. While Aichi Target 11 on protected areas was met in quantitative terms, there remained considerable qualitative issues with regard to resourcing, effectiveness, social equity and representativeness. A large [review of equitable management](#) in protected areas published in *Bioscience* found that little progress had been made to the Aichi commitment in this respect—particularly in participatory decision-making and the recognition of the rights and diversity of local people.

In the worst cases, [human rights have been violated](#) and Indigenous Peoples and local communities (IPLCs) driven from their land. This is especially perverse given that, according to IPBES's [2019 Global Assessment Report](#), nature is generally declining less rapidly in Indigenous Peoples' land than elsewhere.¹⁴ In terms of achieving representative and connected protected areas, shortfalls included the [tendency to designate areas with low agricultural opportunity costs](#) rather than focusing on species protection.¹⁵ These qualitative concerns are not side issues: put simply, there is not much point in placing large areas under protection if such steps fail to meet

¹³ Target 3 under the 2030 action targets (page 6) states: "Ensure that at least 30% globally of land areas and of sea areas, especially areas of particular importance for biodiversity and its contributions to people, are conserved through effectively and equitably managed, ecologically representative and well connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes."

¹⁴ See page 16 of the report. One example of a protected area that greatly benefits from the participation and co-management of Indigenous Peoples is the [Kaa-lyá del Gran Chaco national park in Bolivia](#), which is part of the second largest ecosystem in South America after the Amazon rainforest. It is co-managed by people from the Guaraní, Ayoreo and Chiquitano tribes.

¹⁵ The study linked found that "if protected-area growth from 2004-14 had strategically targeted unrepresented threatened vertebrates, 30 times more species would have been protected for the same area or the same cost as the actual expansion".

the overall aim of improving biodiversity and human wellbeing. These qualitative principles were included in the wording of the Aichi target and it is therefore essential that—at the same time as adopting the overarching GBF goals and targets—Parties commit to a framework for implementation, monitoring and accountability in order to ensure that the underlying aims of the GBF are actually met.

Moreover, excessive emphasis on the 30x30 target diverts attention and resources from addressing the underlying causes of the nature crisis, including overconsumption in rich countries, reductions in emissions and removal of harmful subsidies. Conservation actions are generally carried out by different organisations to those damaging nature, and tend not to address the drivers—or target the sectors causing the greatest impacts. Diverting attention away

from root causes is symptomatic of a tendency to view the crisis as something that may be “solved elsewhere”, which is, in turn, redolent of a mindset that humans exist separately from nature. This is at odds with the GBF’s admirable vision to live in harmony with nature.

Any area-based conservation target adopted through the GBF should therefore not come at the cost of a serious engagement with root causes. In addition, any target should be used in combination with approaches that aim to improve the state of nature everywhere, not just in pristine locations. One such approach is the *Shared earth, shared ocean* (SESO) framework, which puts communities in charge of retaining and restoring 20% of all areas locally. So while the 30x30 target covers a large proportion of a smaller area of land and sea, SESO covers a smaller proportion of the larger area that has already been impacted by people.

- *GBF action*

The 30x30 target (which is currently target 3 in the draft GBF) should not detract from the more pressing need to deal with the root causes of the climate-nature crisis, including overconsumption in rich countries. In addition, the target should only be used in combination with other more comprehensive and people-centred area-based conservation approaches, [such as SESO](#), which must also be explicitly adopted in the GBF.

Furthermore, any naming of a protected area must be accompanied by the free, prior and informed consent of people living in the region—including and especially Indigenous Peoples. Achievement of area-based conservation targets, and the financing thereof, should be differentiated at national levels and fairly distributed across the globe, otherwise there is a risk that the burden of achieving the goals will fall on developing countries. For example, wealthy nations with historically large impacts on nature overseas could provide resources to achieve conservation targets within countries that are most impacted by their supply chains.

Conservation targets should also focus on outcomes rather than just process in order to avoid the mistakes of Aichi, whereby many countries were able to count themselves as having met the target simply by designating protected areas. One way to focus on quality over quantity is to use [biodiversity representation indicators](#). Targets also need to retain an emphasis on areas of particular importance for biodiversity.

- *Domestic action*

A UK strategy for 30x30 should not rely on conservation measures that have been unsuccessful in halting biodiversity loss over the past 30 years. There is little point in designating marginal land for protection or restoring isolated pockets: in order to survive and thrive, wildlife needs a robust natural infrastructure spanning the length and breadth of the nations. The Government has stated that [26% of land in England](#) is already protected and that it intends to add an extra 4% “to support the recovery of nature”.

However, as [Wildlife and Countryside Link](#) has pointed out, the majority of that 26% is made up of Areas of Outstanding Natural Beauty (AONBs) and National Parks, which are used for diverse purposes and do not have statutory designation specifically for high-level protection for nature. Sites that are protected specifically for nature by law [cover 8%](#) of England, but the majority is [not in favourable condition](#). A recent study shows that this leaves [only 3% of England](#) and 5% of the UK that is effectively managed for nature.

The UK Government estimates that if there is wide take-up of Environmental Land Management Schemes (ELMs) in England, there is potential to create or restore up to [300,000 hectares of habitat](#) by 2042 (c. 2.3% of land in England), contributing to a Nature Recovery Network. However,

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a 20% reduction in livestock production in England by 2030—as advocated by the [Climate Change Committee](#)—would potentially release c. 1 million hectares for biodiversity, as well as diverse plant-based food production,¹⁶ and c. 1.8 million hectares by 2050. For the whole of the UK, the amount of land released could be c. 4 million hectares by 2050.¹⁷

The UK Government should work with nature NGOs and the JNCC, as well as the food and farming industries, to create a comprehensive plan to identify, across all ecosystems, the most important remaining biodiverse areas that require long-term statutory designation, as well as existing designated areas that need stricter protection, including critical carbon sinks. This should include agricultural land to ensure connectivity. If the ELM schemes are to be used to create or

restore habitats they need to be strengthened—because as they stand—they lack baseline metrics and clear, targeted objectives to show how success will be measured. In addition the schemes are voluntary and [cannot guarantee long-term protection](#) as farmland is vulnerable to market forces.

The Government's *Joint Fisheries Statement* is central to its ambition to be “[a world-leading fisheries management nation and achieve fully sustainable fisheries](#)”. It recognises that the protection, restoration and sustainable management of blue carbon habitats provides a nature-based solution that “can support adaptation and resilience to climate change, alongside benefits for carbon sequestration and biodiversity”. However, there is a lack of clarity on how baselines will be established, and how objectives for *Fisheries Management Plans* and the minimising of bycatch (the unintentional catch of species such as marine mammals and seabirds) will be met.¹⁸

England has 40 offshore Marine Protected Areas (MPA) but the vast majority are still subject to destructive trawling and dredging. A year ago, the UK Government committed to [banning destructive practices](#) in four MPAs that have the potential to restore some of the richest biodiversity in UK waters. No schedule to make this happen has been announced to date. The UK Government should work closely with the JNCC, marine specialist NGOs, as well as the food and fishing industries, on an urgent plan to protect marine ecosystems and halt overfishing.¹⁹

5. Implementing, reporting and financing

High-level global targets only make sense if they come with a plan for implementation at national levels. When the GBF is agreed at COP15, it must be clear to all Parties and observers exactly how the targets will be achieved and where accountabilities lie. The wording of the Aichi targets from 2010 made it difficult to translate global goals into tangible conservation actions, and it was unclear how national biodiversity strategies and action plans (NBSAPs) scaled-up to global outcomes.

Any plan to transform our relationship with the natural world must be adequately financed, with the requisite resources reaching those who are best placed to implement the solutions. Milestone D.1 of the current GBF draft calls for \$700 billion to be made available per year by 2030. This is a conservative estimate of [what is needed to close the biodiversity financing gap](#). Structural issues, such as removing subsidies, should now be addressed in order to free up public funding.²⁰ Financing for the recovery of nature will be drastically diluted if we simultaneously continue to finance “business as usual” food systems and other markets.

Key challenges which impeded the success of the Aichi targets related to shortcomings in integrating national biodiversity strategies and action plans (NBSAPs) into broader economic and development processes—as well as a lack of clarity regarding how to incorporate and account for contributions of local and non-state actors, such as individuals and businesses. This relates to a

¹⁶In *Green Planet: Human Worlds*, Sir David Attenborough says: “The more plants we eat, the more space there will be for wild plants”

¹⁷ Estimates based on [DEFRA statistics](#) on agricultural land use for livestock and feed crops, together with [AHDB data on feed crops](#).

¹⁸ RSPB points out that [bycatch is preventable](#) and swift action may be taken to address it through effective policy and action delivered through an inclusive, science-led process.

¹⁹ Overfishing is destroying biodiversity and removing carbon. According to the WWF *Climate Smart Fishing* report “The fishing industry’s extraction of fish above sustainable levels is also an extraction of blue carbon, further contributing to GHG emissions”.

²⁰ A recent [IMF study](#) found that every 75p spent by both the public and private sectors on addressing climate change and biodiversity loss can generate over £5 worth of return.

broader disconnect between actions to conserve nature and actions leading to loss of nature. The “mainstreaming” of nature can help to address this by translating high-level goals into meaningful and inclusive actions at multiple scales throughout society. Mainstreaming can also produce a shared sense of responsibility, empower people to respond, help businesses to manage risk and opportunity, and enable better reporting on local actions.

- *GBF action*

This GBF must be supported by a well-resourced implementation framework. This should include: a set of clear headline indicators, complemented by component and complementary indicators to

allow robust and comparable monitoring; a process for elucidating national ambition in the first year post-agreement; a clear process for standardised updating of NBSAPs and national reporting; and a timeline for tracking and ratcheting ambition and implementation.

The implementation framework must also integrate biodiversity commitments across all sectors of society so that it can be used for coordinating, prioritising and tracking the responsibilities and contributions of different stakeholders. The [Mitigation and Conservation Hierarchy](#) could contribute to mainstreaming and implementation—it can be used at all scales and by all actors for coordinating and prioritising actions towards an overarching, united goal. It can encompass any action that affects nature—positive or negative—and is flexible and intuitive.

The full potential extent of the biodiversity financing gap of \$824 billion must be bridged; there should also be a clear plan for developing countries to access these funds, and the role of the finance sector in addressing the gap and harmful subsidies should be clearly defined.

- *Domestic action*

The global and domestic commitments that the Government has signed up to, such as The Leaders Pledge for Nature, the Global Methane Pledge, the [Global Ocean Alliance](#) and the commitment to protect 30% of UK land for nature by 2030, do not currently match UK laws and policies for delivery. Current mechanisms for delivery of a [Nature Recovery Network](#)—the Local Nature Recovery Strategies as well as ELMs—are not joined-up and, along with policies published in the [Joint Fisheries Statement](#), are hampered by lack of clarity and delay. An ambitious, joined-up, NBSAP should be created, starting immediately, working with the JNCC and in collaboration with the business community and civil society. The [National Food Strategy](#) suggests working with relevant agencies to map out a holistic ‘National Rural Landuse Framework’ to identify, for example: ‘the agricultural productivity of any given area of land, its potential for environmental restoration and carbon sequestration, and local pollution levels in air and water.’

The implementation plan should follow a whole-of-government approach and could be financed, in part, through transfer of subsidies for harmful practices such as excessive livestock production. Baseline metrics and robust objectives should also be published to show how success will be measured.²¹ The plan must take into account the UK’s domestic and global ecological footprint and be applied to international trade deals. Implementation should start without delay, after the plan has been drawn up, in order to reduce the effects of key drivers as soon as possible, as there will be a lag in the time that it takes various ecosystems and species to recover.²²

The Environment Act currently commits to five-year interim targets, but we need a more robust process for accountability, enforcement and monitoring, and annual reporting that will highlight whether or not actions are working. This should include annual interim targets—as called for in the [Climate and Ecological Emergency Bill](#).

²¹ “[Three complementary approaches to the use of indicators are needed](#) to realise the outcomes of the GBF. The first is to track overall progress towards goals—headline indicators. The second is to progressively improve indicators in order to understand how drivers cause biodiversity change, thereby allowing changes in biodiversity to be attributed to changes in drivers and actions—this should be the main role of component and complementary indicators. The third approach, which is at present almost completely overlooked in the GBF monitoring framework, uses indicators to inform strategic planning (including prioritisation) of actions to effectively and efficiently achieve targets and goals”.

²² “[Crucially, immediate action](#) will also lower the cumulative loss of biodiversity and shorten the time and increase the probability of recovery, and result in overall lower costs in the long-term.”