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JNCC FMPR STAGE 1 REPORT

Thank you for the opportunity to provide comments on this report. As you know we have been involved in the Steering Group for the FMPR and provided comments on the earlier draft.

English Nature's Council have considered the role of the JNCC at its October 2000 meeting when Sir Angus Stirling gave a presentation on the future roles and functions of the Committee as part of their strategic review. We prepared a paper on the role of the JNCC following this meeting, much of which was incorporated into Mike Baldwin's interim report to the Steering Group in November 2000. The JNCC Strategy Review also included our suggestions of priorities for their work which was reflected in the agreed Statement of Strategic Direction submitted by the Joint Committee to the reviewing officer in December 2000. The key areas we believe are important are -:

1. Information on the status of habitats, species and natural features across the UK and trends in this to identify priorities and provide the basis for conservation objectives. This needs to be set in a wider European and international context to ensure work within the UK contributes effectively to international nature conservation priorities.
2. Information on the extent and effectiveness of programmes for nature conservation, especially to allow reporting obligations to be met and to help mutual learning from experience.

3. Interpretation of the information based on appropriate scientific knowledge so the reasons for trends, successes and failures is understood and therefore can be addressed.
4. Research and review to improve understanding and to provide a sound basis for interpretation of the results of survey and monitoring programmes and to explore common problems, often in an international context.
5. Contributing to programmes of policy advice and analysis, especially at European level, in partnership with the Country Agencies who have the experience of and responsibility for advising on implementation within the UK.
6. Common standards and frameworks on scientific issues relating to nature conservation including site selection (in particular internationally designated sites), survey and monitoring standards and using experience and understanding of issues in the UK to contribute to and influence the science work that underpins international agreements and the EU Directives
7. Supporting the UK Government in international meetings through sound advice, representation in working parties and ensuring a shared understanding of the common issues.

English Nature therefore considers the JNCC is essential to ensure our work is set in a wider UK and international context.

Our Council also considered the draft Stage 1 Report informally in February 2001 and the final Stage 1 Report formally in May 2001. We welcome the broad conclusion that the services provided by the JNCC are necessary and valuable: we firmly agree with this and consider the international perspective presented also drives our priorities and programmes. The Report understates the degree of integration between the work to implement international agreements on the ground through the Country Agencies and the work to ensure this is done within a clear over-arching framework of standards and obligations. The various formal and informal networks have strengthened this integration which the current legislation requires and we value as it ensures effective and high quality programmes on the ground.

The Report is also valuable in highlighting better the UK Government's perspective on nature conservation and the international stance it takes. Whilst there are some aspects that are not clearly linked to Country Agency work, such as CITES which focuses on trade issues, most of the international requirements would benefit from the experience of the Country Agencies in both direct programme delivery and efforts to integrate nature conservation into wider policies in practice. So whilst nature conservation in the Overseas Territories and contributions to other international nature conservation efforts will require unique ecological knowledge not available in or derived from that used by the Country Agencies, knowledge of the practicalities of

implementing programmes in a range of circumstances will help ensure the UK Government's contributions are well designed.

The Report identifies a range of key weaknesses that we agree must be addressed -:

1. Ensuring the UK Government's needs are well defined and included in the work with appropriate priority and resources.
2. The budget needs to be established more simply and on at least the same time frame as the Country Agencies budgets to allow longer term planning and more certainty.
3. Staff terms and conditions which now differ significantly across the Country Agencies and cause concern, especially with staff who have been recruited directly to the JNCC Support Unit and therefore have rather tenuous links to any Country Agency.
4. Working practices through Lead Agencies and Networks where accountability and commitment to the Joint Committee appears to be less direct than work done by the Support Unit, but which does allow the full resources and expertise of the Country Agencies to be used for the special functions.

The international context for nature conservation and the ecological relationships across the UK mean that most of English Nature's work is strongly influenced by international policies and agreements, and requires close cooperation and coordination within the UK. There are clear requirements to operate to common standards so the UK's obligations can be reported on and assessed. Equally many of the sectors with most influence and impact on nature conservation are subject to international agreements and EU policies which we need to understand and advise on to achieve the nature conservation objectives. Influencing any international policy or programme requires a good understanding of the interests of the other parties and sound partnerships to secure any desired changes. As all the Countries in the UK are subject to broadly the same set of international agreements and EU policies which define nature conservation obligations or which affect the main economic activities affecting nature conservation, we need to work together to build the wider understanding and partnerships needed to advise the UK Government and to secure desirable change.

We therefore feel the Report identifies many of the appropriate issues, indicates the value of a wider international perspective on nature conservation but, because it understates the existing integration between the Country Agencies work and the JNCC's programmes, comes to the wrong conclusion. We therefore advise that the recommendation to establish new independent UK Nature Conservation Advisory Council to replace the JNCC should be rejected. It would make it harder to ensure the Country Agencies work was actively integrated with the work to deliver the special

functions without reducing the interest the Country Agencies would retain in working jointly to influence and understand the international context.

We recommend that Stage 2 should focus on how best to improve the current arrangements to meet the weaknesses identified and to build on the strengths and successes of the JNCC and the Country Agencies working together under the current arrangements. This will ensure we make the most of the current arrangements anyway and allow us to review any remaining issues that would require additional legislation to address. We look forward to participating positively in Stage 2 where we have a range of ideas to offer.