

Ms Alison Burtenshaw
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I am most grateful for the opportunity of commenting on the stage 1 review of JNCC. This reply is on behalf of the RSPB, in all four countries of the UK.

Introduction

The RSPB is of the strong view that nature conservation within Great Britain (and Northern Ireland) has certain fundamentals which benefit from a shared approach. Wildlife knows no boundaries, and thus it is sensible to share knowledge and organise many surveys on a national (UK) basis. Criteria for selecting sites of European standard must be developed (as now) on a UK basis – however we believe the current JNCC fails to adequately engage with the devolved Northern Ireland administration. The UKNAC, as proposed, should remedy this.

In addition there may be a advantages of co-ordinating the approach to these issues between NI and the RoI through the North-South arrangements, established by the Belfast agreement.

Detailed Comments

- The UKNAC as proposed would report to DEFRA. DEFRA is also responsible for English Nature. Post Devolution SNH and CCW report to their respective Ministers and Parliament/Assemblies. It is essential that the shared ownership of JNCC continues with the UKNAC. As proposed this could be eroded and lead to resentment in Wales, Scotland (and presumably Northern Ireland).
- A UK body charged with establishing criteria for the selection of the Natura 2000 series within the UK, and supervising the UK reporting on meeting EU and International Conservation Measures to is required.
- Such a body must be able to ensure consistency of approach within the 4 countries of the UK, in meeting these EU/international obligations. Individual

countries of the UK could aspire to exceed these baseline standards if they so wish.

- We see considerable merit in the pooling of resources for the monitoring of the UK Governments quality of Life Indicators (Biodiversity); and in co-ordinating International work in Biodiversity.
- We see similar synergies in the sharing of conservation research and monitoring programmes across the UK, and planning the major programmes at a UK level.

We would urge DEFRA to ensure ownership of the UKNAC by the following:-

- Establishing an independent chair – agreed by all 4 administrations.
- Board Representation from each countries statutory conservation agency – as of right.
- Appointments to the Board by each “Environment” minister in each country of the UK.
- The appointment of 2 or 3 senior independent academics or senior conservationists by the Ministers acting jointly.
- Defining the role of UKNAC to co-ordinate and deliver those functions of a UK nature – ie EU/International work, criteria for the selection of sites (eg SSSI's) and standards monitoring etc.
- Encouraging joint working by the four countries as appropriate.

This approach, as well as continuing an element of the existing joint funding, will ensure “ownership” of the joint body by the devolved administrations and, thus, political agreement and support for its UK overview.

Lastly it might be useful for the UKNAC to have a role supporting the Council of the Isles in its work. Shared issues and cross border matters concerning these international conservation obligations arise on a regular basis.

I trust these comments are helpful. Please do not hesitate to contact me if you require further enlargement on item points.

Yours sincerely

Stuart Housden
Director, RSPB Scotland