

Sustainability Committee

SC(3)-BIO4

Inquiry into Biodiversity in Wales

Written response by Plantlife Cymru, September 2010

Summary

- Plantlife Cymru believes that changes of approach and resource allocation are needed for Wales to meet new national and international targets for biodiversity, including our commitments to the Global Strategy for Plant Conservation
- Assembly resources for biodiversity action are inadequate, and do not reflect public opinion and commitment
- The UK BAP and Section 42 processes face new constraints to delivery, precisely at a time when dedicated action on priorities identified would ensure considerable progress towards halting biodiversity loss
- Plants and fungi must be recognised as the building blocks of our landscapes and habitats and their fundamental role in maintaining all our other wildlife should be appreciated.
- By Plant-proofing the allocation of biodiversity resources (ensuring more resources go into the foundations ecological food webs and chains) a greater diversity of wildlife will be conserved in a more sustainable and cost-effective way.

Introduction

Plantlife is the wild plant conservation charity in the UK. Our wild plants have been marginalised and taken for granted for too long. Wild plants clean our air and water, provide food and shelter for our insects, birds and animals and will be critical in the fight against climate change.

Plantlife is the organisation that is speaking up for the nation's wild plants. We work hard to protect wild plants on the ground and to build understanding of the vital role they play in everyone's lives.

Plantlife Cymru is our operation in Wales. As signatories of the Wales Environment Link Response to the Biodiversity Inquiry, that document forms our principle response to the Inquiry. We present here some additional points in relation to the situation regarding plants and fungi in Wales.

Responses to Inquiry questions

Why did Wales fail to achieve the 2010 targets for halting biodiversity loss and what changes of approach are needed to ensure greater progress in the future?

- What delivery mechanisms were in place to achieve the 2010 targets?

- Why did these fail to deliver?

Policy framework

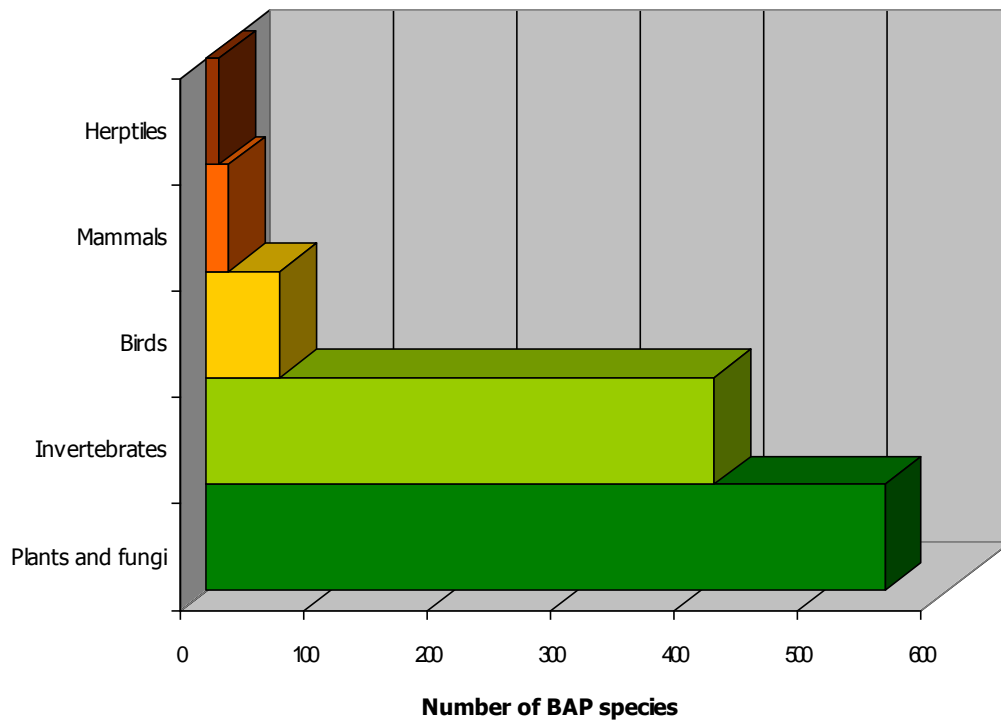
Plantlife Cymru welcomes positive demonstrations of the Welsh Assembly Government commitment to biodiversity, including sign-up to the UK's response to the Global Strategy for Plant Conservation (GSPC) - Plant Diversity Challenge (PDC, see http://www.plantlife.org.uk/publications/plant_diversity_challenge/), and support for subsequent activities such as the identification of the UK's Important Plant Areas (IPAs).

The 2007 progress report '*Plant Diversity Challenge: 3 years -16 targets - 1 challenge*' () recommended that the UK and devolved governments undertake a review of the schemes available to conserve important plants and fungi (including the protected area network, agri-environment and forestry schemes) and where necessary re-focus these schemes to ensure they are working to stop plant and fungal diversity loss and to increase ecological resilience in the wider landscape. Without this overhaul and focus the UK will not meet its Global Strategy for Plant Conservation commitments.

From a botanical perspective we consider policy and institutional frameworks inadequately protect plant diversity. '*Plant Diversity Challenge: 3 years -16 targets - 1 challenge*' highlighted how those GSPC targets requiring action across UK policy sectors have not successfully progressed compared to those targets led by the research and conservation sectors. Examples of inadequate protection include the Wildlife and Countryside Act (WCA) (1981): habitat destruction continues to pose the main threat to plant diversity, however, at present Section 13 of the WCA does not protect the places where plants grow - it is an offence to kill a plant, but not to destroy its habitat. This is compounded through the SSSI site selection guidelines which state that there should be 'a presumption for selecting... all sites with viable populations' of Schedule 8 species. However, species listed on Schedule 8 only qualify as those which are vulnerable to collection and not habitat neglect or mismanagement.

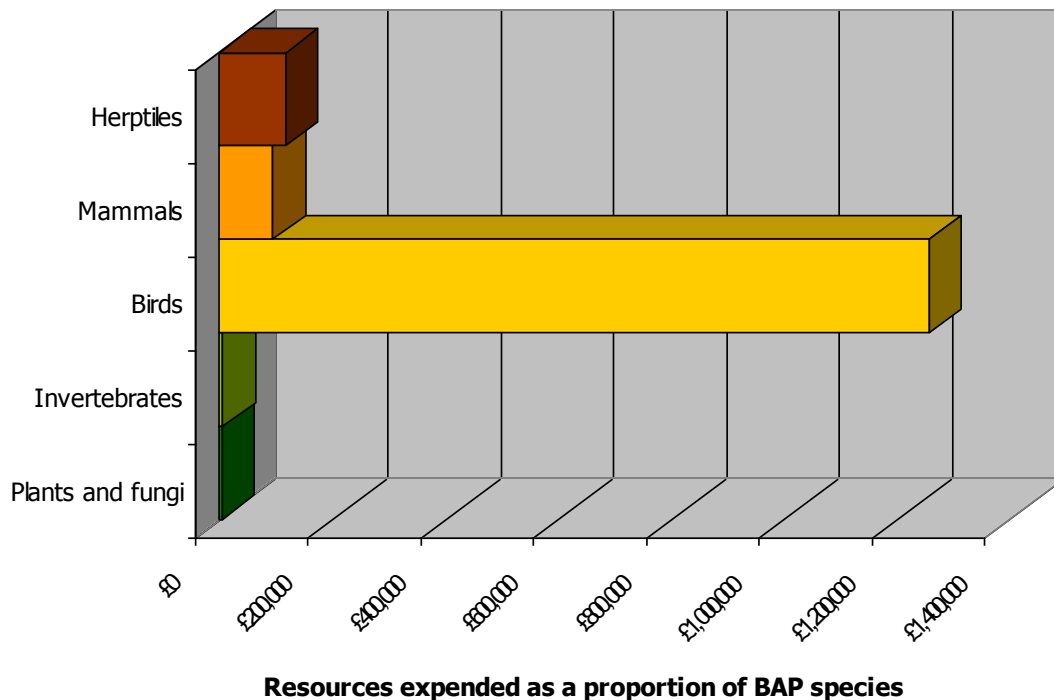
BAP and Section 42

The BAP framework is the principle mechanism through which species and habitat conservation is undertaken and co-ordinated, and is crucial to the delivery of GSPC target 7 (conserving threatened species). . However, there is a fundamental imbalance in our focus and allocation of resources amongst the different species groups. Plants and fungi are the poor relations of the wildlife world. Of the 1150 UK BAP species, 49% are plants and fungi:



In Wales, of the 543 section 42 species in Wales, 215 (40%) are plants and fungi.

Despite this dominance of our priorities, they are allocated a fraction of the resources available to other groups. Between 2007 and 2009, JNCC let research contracts worth £4 million, yet none of this was spent on plants or fungi. The following shows the resources spent by conservation NGOs in 2008-2009 on all UK conservation activities, expressed as a proportion of the number of UK BAP species in their respective taxonomic group. For birds, £74.2 million was spent and there are 59 UK BAP birds (£1.2 million per species); for plants and fungi, £1.9 million was spent and there are 549 UK BAP plants and fungi (£3523 per species):



Wild plants and fungi sustain all our other wildlife. Green plants, the very fabric and colour of our landscape and the building blocks of our habitats, are the primary producers, providing the food and shelter on which all our other wildlife depends. Ecosystems are naturally complex webs of interdependence between a whole host of species and wildlife, but without plants entire webs and food chains collapse instantly.

Plant-proofing is a way of refocusing our attention back onto plants and fungi. Putting resources into the building blocks of our habitats will bring long-term and sustainable conservation to a wide range of wildlife, not short-term unsustainable fixes that bring temporary gains for a few species higher up the food-chain.

An automatic response to the problem of declining bee populations, for example, is to sow nectar-rich wildflower seed-mixes. While such action has a place in urban areas, they are expensive, need to be re-sown annually and often include non-native species that are of little benefit to other native wildlife. More importantly, they sidestep the underlying issue of native wildflower loss from local sites. Instead of this “nectar bar” quick-fix, we should be asking “which wild flower habitats need restoration in order to provide a long-term and sustainable source of food and shelter for a wide range of wildlife”. The question, “why are there no bees anymore?” could be answered with, “well, where are the native wild flowers in our countryside to sustain them?”

The aims of plant-proofing are twofold:

- to underpin the conservation of all our wildlife by ensuring that it incorporates sound management of our native plants and fungi

- to maximise the potential for the conservation of threatened and other important plants and fungi by integrating their needs with those of other wildlife of concern.

The conservation of plants and fungi should therefore be considered a fundamental requirement of any sustainable and cost-effective wildlife conservation project or activity. If we can get the management of plants and fungi right at a particular site, all other wildlife will benefit.

All conservation and land management projects should seek to maintain and enhance populations of any priority plants and fungi on the site, and ensure that internationally recognised Important Plant Areas (IPAs) are not merely left undamaged but are enhanced by conservation action.

Plantlife Cymru believes that projects and activities should only be undertaken if they treat native plants and fungi as the fundamental building blocks of all wildlife habitats and as key considerations in all conservation project plans.

The BAP Framework

Plantlife Cymru believes that the new BAP framework is an excellent model for successful delivery of BAP targets, but it requires sufficient support and funding from the Assembly to ensure that partners are fully engaged and motivated. The large number of meetings and groups are currently sustained by goodwill and limited funding and capacity from the NGO and government sector. Given the current financial climate both capacity and goodwill cannot be guaranteed.

We believe that the BAP framework (though WPB) needs a fully funded and operational secretariat in order to provide support and help for the structure of the framework and, importantly, for the species forums and Lead Partners. Several species forums exist (e.g. Plant Link Cymru) and others are being formed (e.g. Bird Forum) but there are significant gaps (e.g. invertebrates). These groups are fundamental to the success of the new BAP framework as they provide the link between species and habitat conservation (a key to the success of the new framework), but capacity to run and organise such groups is a challenge, especially for the smaller NGOs. A small amount of WAG/WBP secretariat support for these groups would bring very considerable benefits.

The role and remit of species Lead Partners has also been overlooked. Without more support and leadership for this essential role from WAG, the goodwill of those organisations in undertaking the Lead Partner role will diminish.

BAP data, monitoring and reporting

We believe that considerable confusion remains over the BAP reporting process through BARS. This is due to a lack of training and a lack of clarity regarding responsibility for reporting within the complex hierarchy of LBAPs and Lead Partners. As such, we believe BARS is currently a very poor reporting mechanism.

More serious is the continued complexity of the recording framework within Wales. Although considerable resources have been poured into the establishment of the Local Record Centre network in Wales, specialist recording societies and field recorders have almost zero confidence in the LRCs due to a failure to establish clear lines of record flow, the verification of records, the relationship of LRCs to the NBN and issues of record ownership. Without this confidence and clarity, we will remain in a situation where we have no centralised database of records for S42 species (something that would be of immense value to WAG, agri-environment schemes and planners as well as the recording community) and confusion over who to approach for verified and correctly interpreted data.

Another key issue comes from the fact that monitoring of priority plant species relies heavily on the volunteer sector, and it is usually down to Lead Partners and specialist societies to co-ordinate and support their volunteer networks. Insufficient resources are available for this support and monitoring is therefore not effective. For plants, there is a particular problem of recording highly specialist groups such as fungi, lichens, mosses and liverworts. Currently, the trend for original UK BAP species in Wales is “unknown” for 22 of 55 species (39.9%), and most of these are fungi. For this reason, much more support should be given to volunteer co-ordinators and the training of experts. In the discussions around the “big society” it’s essential to realise that volunteers can only function effectively if there is adequate support for them. One co-ordinator can engage large numbers of volunteers, but without a co-ordinator they will quickly become disillusioned and stop their work. It is also true to say that there is a real issue with the quality of data collected by volunteers. Of the large number of volunteers Plantlife Cymru has engaged over the years, only a very small percentage (ca. 10%) can be considered of to regularly collect high quality data that is useful for monitoring. This has implications for data collection – it’s more effective to put resources into training and supporting a small number of high quality volunteers, rather than aiming to engage large numbers of poorly trained volunteers. For this reason, Plantlife Cymru welcomes the WBP Lichen Apprenticeship scheme, but asks that the emphasis is again on training a very small number of potentially good recorders (2-5 people) to become the experts of the future, rather than a larger number of less expert people. There is critical shortage of such expertise in Wales at the moment, with the number of expert posts for lower plants and fungi reducing in both the NGO, government advisory and national museum sectors.

We note that there is only one indicator in the ‘UK Biodiversity Indicators In Your Pocket’ (BIYP) that relates directly to plant diversity. Currently this indicator is assessed solely using Countryside Survey data, and whilst this shows overall plant diversity to be deteriorating it does not adequately portray trends such as those for birds, butterflies and bats. On the whole, the use of indicators to assess success provides a diluted and skewed picture of progress. Plantlife Cymru welcomes the recent work to develop a wider range of indicators for Wales, and this work should be finished. It is important to note JNCCs recent work on the development of a UK Plant Surveillance scheme

(as part of the UK Terrestrial Biodiversity Surveillance Strategy) to establish a more reliable and accurate source of botanical monitoring data than is currently provided by the Countryside Survey.

Agri-environment Schemes

Target 6 of the Global Strategy for Plant Conservation requires 30% of production lands to be managed consistent with the conservation of plant diversity. This includes all productive agricultural land as well as forestry. Currently, our best estimate of such land managed for plant diversity (not necessarily just included in AE schemes) in Wales is 13%. If Wales is to reach its GSPC target, Glastir will need appropriate resourcing, not only to maximize uptake but to ensure there are enough staff to administer the scheme, target uptake of appropriate prescriptions in species key areas, and allow training of staff from the NGO sector.

Agri-environment schemes are also failing to deliver the widest biodiversity benefits they should be capable of. Arable plants are the most threatened group of plants in the UK yet the uptake of the cultivated margin options that meet the needs of these has been very low. In Wales, only 2% of all 2925 Tir Gofal agreements include options that deliver all the needs of arable plants. Moreover, the total area of land on which they are applied is very small, just 3033 ha (2.2% of land under Tir Gofal).

Plantlife Cymru welcomes the development of Glastir but is concerned that there is no mechanism to ensure that some very positive, specific successes of Tir Gofal will not receive automatic follow-through into the new scheme. For example, the Section 42 species Lesser Butterfly Orchid has spread from a SSSI near Lampeter (Cae Blaen Dyffryn) onto a neighboring Tir Gofal farm after several years of appropriate management. In another case, a 13 year-old pasture on farm in Pembrokeshire was ploughed for an arable crop and Cornflower appeared, only the third such site for this species in Wales. Unlike birds and animals (which move around the landscape), plants remain largely fixed in place. This means that management applied to these sites instantly has an effect. Should these farms not qualify for Glastir, or the farmers not be inclined to enter the new scheme, this site could be lost. We would welcome a mechanism that allows a handful of such sites (less than 10) receive protection so that some of the good work of Tir Gofal is not lost.

Plantlife Cymru is concerned that a focus on prescriptions for, and the performance of, some species will not meet all the needs of other biodiversity, as there is no real evidence to suggest a direct link between, for example, the success of bird populations and of plants in associated habitats. Indeed often the artificial management techniques implemented under agri-environment schemes for farmland birds (e.g. bird seed mix, Skylark plots) specifically do not improve conditions for other species (e.g. plants and insects). Glastir should therefore be Plant-proofed (see BAP and Section 42 above) to ensure maximum delivery for all taxa in the most cost-effective and sustainable way.

Protected sites network

The protected sites network is currently failing for wild plants and fungi. For example, there is currently no requirement for protected sites to protect BAP priority species that occur on them. Also, unlike for animals and birds, there is no legislation to protect the actual sites where Schedule 8 plants grow.

Across the Sites of Special Scientific Interest network plants and fungi suffer from poor understanding, management and monitoring. Poor management means that some SSSIs have lost the plants for which they were specifically designated. Undergrazing of Llyn Cwm Bychan SSSI, in Gwynedd, for example, means that the Marsh Clubmoss for which the site was scheduled has not been seen there for a decade. Site sites should be a priority for action through the provision of Section 15 payments. More often than not, constraint is in the capacity for local CCW staff to monitor the situation and take appropriate action.

Poor understanding means that some SSSIs inadequately cover the plants they are notified for. Following notification, new populations or habitats just outside the boundary are often found to be of SSSI quality, but it can be difficult to then modify boundaries and protect these plants. This can rarely be done for mobile birds and animals, but is relatively straightforward for plants and fungi. We would welcome a review of the SSSI network to identify where this situation arises and rectify it, along with notification of the many pSSSIs that have not been scheduled and which have deteriorated in quality.

Poor monitoring means that there are SSSIs where the plant feature is in decline but the overall condition of the site is assessed as favourable. According to CCW, 36% of flowering plants and 36% on non-flowering plants are in unfavourable condition on SSSIs. Plantlife Cymru asks that an audit of rare, threatened, priority and other important plant and fungus populations on all SSSIs is undertaken by the end of 2011 and ensure conservation or management objectives are set for all species.

Plantlife Cymru welcomes long-term management plans for protected sites, such as CCW's Upland Framework, a 100-year vision of management of all upland SSSIs. Management plans should include measures to increase species resilience and landscape connectivity, so giving plants a better chance to meet the challenge of climate change.

We ask for an offence of reckless destruction of the place where a protected plant or fungus grows. Plantlife Cymru recommends a change to Section 13 of the Wildlife and Countryside Act (1981) to cover plant habitat protection through legislation in Wales.

Some of the most destructive cases of damage to SSSIs have occurred when owners of sites were unaware of the status of the sites or of their obligations (e.g. the destruction of 0.4 ha of SAC Oak Woodland at Coed Llechwedd, Harlech in 2006/7). Plantlife Cymru asks that CCW undertakes an immediate audit of all SSSI owners and ensures they are aware of the status of their land and their obligation.

- ***Is the current approach to dealing with climate change mitigation and adaptation in Wales sufficiently integrated with policies for biodiversity?***

Plantlife Cymru believes that there is insufficient evidence for the effectiveness of connectivity in the wider landscape. Plant species, in particular, are relatively immobile. Dispersal rates and distances are certainly lower than for animals and birds. Establishment of “wildlife corridors” to increase the permeability of the landscape and increase reliance to climate change is not currently based on a sound scientific foundation. Despite this, a huge amount of work (both mapping and habitat restoration) is both planned or underway.

Plantlife Cymru believes that a far more effective method of building resilience into species and habitats is the establishment of a network of habitats across particular landscapes. Fragmentation of habitat networks is well known and well established as a driver of species loss. We should therefore aim to restore sites within discrete landscape areas, especially around and adjacent to existing protected habitats. Long-term habitat planning frameworks, such as the CCW Upland Framework, are a much more effective way of providing species with a chance to survive changing climates.

- ***What examples of good practice are there elsewhere in the UK and internationally that Wales can learn from?***

See WEL response.

- ***What are the implications of emerging international targets for 2020 and beyond?***

See WEL response.

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