

CONSULTATION

Response Document



2030 Strategic Framework for International Climate and Nature Action

(Department for Environment, Food and Rural Affairs)

22 April 2022

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Northern Ireland Environment Link
- Scottish Environment Link
- Wales Environment Link
- Wildlife and Countryside Link
- Greener UK (Supporter)
- Environmental Policy Forum
- IUCN – The World Conservation Union
- IUCN-UK
- Professional Associations Research Network
- Society for the Environment
- United Nations Convention on Biological Diversity (Observer Organisation)

We welcome the opportunity to participate in this consultation and would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy) at JasonReeves@cieem.net with any queries.

See Defra's context for this consultation given in Appendix 1.

When answering these questions, we would like you to consider:

1. The UK's position in relation to other countries (e.g. strategic advantage deriving from bilateral and multilateral relationships, economic and trade position, UK's soft power, our leadership position in climate negotiations, and [Official Development Assistance](#) (ODA) and non-ODA investments).
2. The wider environmental, societal and economic impacts of climate and nature action (e.g. impacts on the economy, trade-offs between climate and nature action).
3. That the [Integrated Review](#) sets out HMG's overarching geographical priorities and that by 2030 we will be deeply engaged in the Indo-Pacific, active in Africa, particularly East Africa and with important partners such as Nigeria, and that we will have thriving relationships in the Middle East and the Gulf based on trade, green innovation and science and technology collaboration.

Please note we are not seeking views on domestic interventions in the UK.

1. Relative to other nations or international organisations, what do you consider are the most impactful and strategic interventions that the UK Government can take for climate change mitigation internationally? Max 250 words.

International mitigation efforts must be focused on reducing fossil fuel use by eliminating subsidies, loans and financial assistance for fossil fuel industries. We should not be supporting industries internationally which result in high emission levels and limit investment in green technologies.

The Glasgow Financial Alliance for Net Zero (GFANZ) progress report summarises this succinctly. It states "Governments need to set out the specific steps they plan to take nationally, while delivering on their goal to mobilise at least \$100 billion annually in climate finance to support the needs of emerging markets and developing countries. They must lead by establishing global policy frameworks that correct existing market failures and enable action at scale." The report also calls for governments to "set phase-out goals for fossil fuels and fossil fuel subsidies and ensure that these subsidies are redistributed to support the 'Just Transition' for all."

Government must provide resources (funding, guidance, policy) to address the international links between biodiversity loss (e.g. deforestation in SE Asia), carbon release, and land-use for agriculture (e.g. palm oil, soy, beef), minerals (e.g. for fertiliser, electrical devices including electric vehicles), materials (e.g. timber) etc. We must recognise our role in the supply chain and improve education and labelling accordingly for purchasers in the UK. We also must ensure any programmes to label products as "sustainable" are meaningful, accurate, auditable and accountable.

2. Relative to other nations or international organisations, what do you consider are the most impactful and strategic interventions that the UK Government can take to support international climate change adaptation action? Max 250 words.

From a financial drivers perspective, mandating the requirement for Task Force on Climate-Related Financial Disclosures (TCFD) compliant reporting for UK-based companies with UK and/or overseas assets/supply chains, and, importantly, subsequent evidence of actions to address disclosures of risk could drive private efforts for adaptation. Currently, climate disclosures occur (and will be mandated for some), but action in light of disclosures by corporations is driven by market forces, rather than encouragement from the UK Government. Embedding more 'natural capital thinking' would also help drive this.

Support must be provided internationally for those dealing with the impacts of climate change already, and those expected to be worst hit. The UK must reinstate the overseas aid budget and increase it specifically to support countries in their efforts to adapt to and mitigate the impacts of climate change and biodiversity loss. Payment for ecosystem services and habitat protection on an international scale would help provide space for nature to adapt to climate changes, while also aiding human adaptation (e.g. through supporting water provision, flood control, pollination, and human health and wellbeing).

3. Relative to other nations or international organisations, what do you consider are the most impactful interventions the UK Government can take to halt biodiversity loss internationally? Max 250 words.

Government should implement the recommendations of the Dasgupta Review on the Economics of Biodiversity, including the introduction of nature-based solutions (NbS) and natural capital accounting, and use this as leadership leverage at the OECD, G7, UN Security Council, etc.

Government should introduce mandatory Taskforce on Nature-related Financial Disclosures (TNFD) requirements alongside TCFD. UK companies, which the Government can influence the behaviour of, create significant direct and indirect biodiversity loss globally through their activities. If private companies were required to disclose their direct and upstream/downstream impacts ('scope 3 biodiversity impacts') then this could catalyse international efforts to mitigate those impacts.

Improved standards for imports should also be introduced. Existing legislation relating to ivory imports has helped reduce international ivory trade and associated biodiversity loss, but there are many other industries/products which result in far greater scales of impact, with little oversight through trade-linked legislation which can influence these. In particular, legislation is needed to introduce meaningful (i.e. current carbon prices are too low) taxes on embedded carbon and water in imported products.

Overseas aid must also be redirected to stop habitat and species destruction, for example, by not supporting the expansion of agriculture at the expense of natural habitats. This must also involve programmes to support overseas biodiversity protection/restoration and sustainable sources of income for local communities (e.g. sustainable tourism and paying for ecosystem services).

Government should advocate application of the Lawton Principles (more, bigger, better and connected spaces for nature) internationally to allow species to move (including across international borders) as the climate changes. Some species will need more help (e.g. if they have moved up in altitude but have no further to move, or if they reproduce and/or disperse so slowly that they cannot keep up with changing conditions).

4. What are the most important interventions the UK Government can take to deliver co-benefits for climate, nature and people? And which are the trade-offs to consider? Max 250 words.

Government must take the opportunity to address the triple, interlinked crises of climate change, nature loss and inequality together. This could be achieved by focusing action on the Sustainable Development Goals.

Please see answers to questions 1-3 for recommended interventions.

Any delays to action will result in more costs and damage in the long run. Action now is good for communities, jobs, human health, and the environment. Painting a picture of a need for trade-offs obscures the need for urgent action now and unnecessarily undermines the necessity of those actions.

5. Do you have any evidence regarding particular regions or countries we should be focusing on, both in the immediate and long term, given expected trends? Max 250 words.

In the short-term, countries under immediate threat from climate change (e.g. through sea level rise, coastal squeeze and heat stress) need the most support.

And rather than concentrate on growing trade in the Middle East which will focus on fossil fuels, the UK Government should support the UK Overseas Territories, Crown Dependencies and the Commonwealth to adapt to and mitigate the effects of climate change. Particular attention could also be given to cooperation across the Ireland-UK border.

In the medium-term, developing economies need to be supported in the transition to a zero carbon world. This could involve relaxing intellectual property rights on green technology to allow developing nations to make the jump to renewables. Best practice could also be shared on greening cities (e.g. green infrastructure), which is particularly important for developing nations that are urbanising quickly.

Government should also allocate funding to the nature and climate crises as if they really are the government's "*top international priority*", whereas £4 billion in nature and climate spending compared to £45 billion on defence spending suggests that it isn't a priority.

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Appendix 1: Context

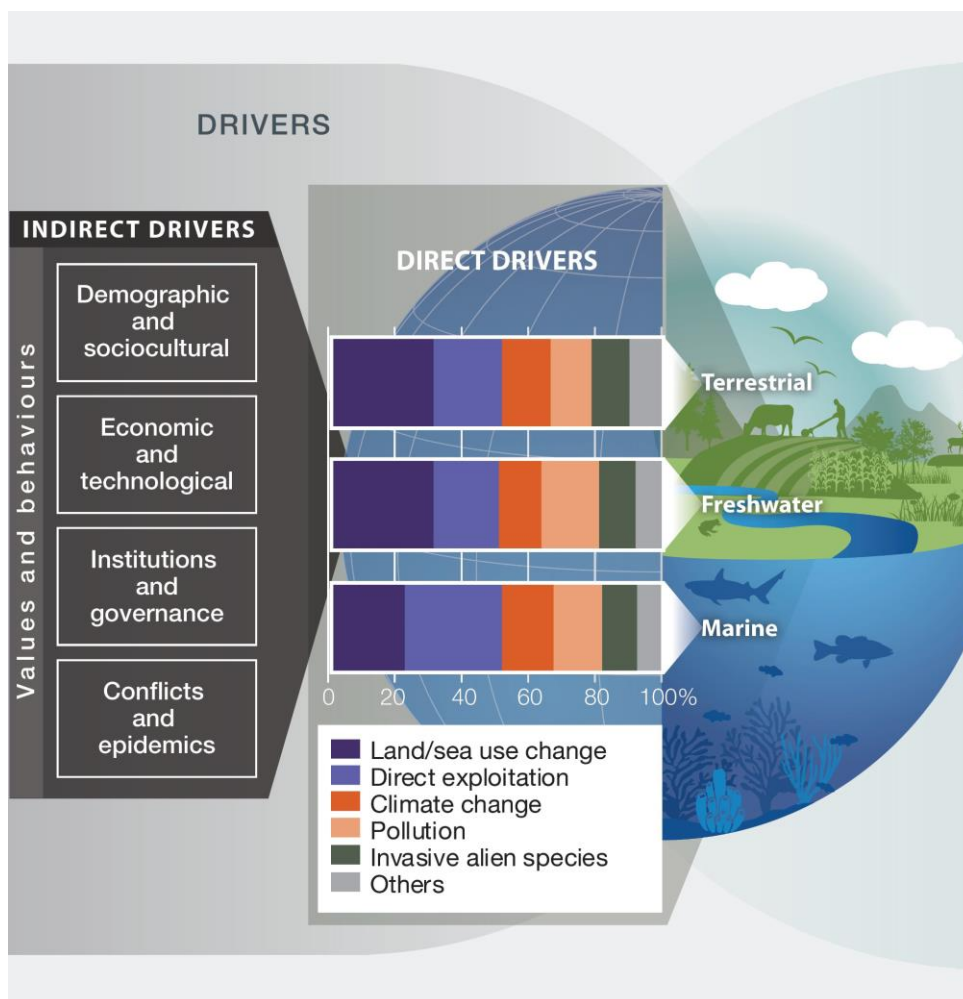
Tackling climate change and biodiversity loss is the UK's top international priority, as identified in the UK's Integrated Review. The 2030 Strategic Framework will aim to support delivery of the Integrated Review by defining high level goals and outcomes. It will also act as a policy framework for action, which will be reviewed and adapted over time considering progress and emerging opportunities and challenges.

The Government has already taken bold steps internationally through our Presidency of the UNFCCC COP26 and the G7, and the 2030 Strategic Framework will outline continued UK leadership over the next decade, taking stock of progress being made in the post-2020 Global Biodiversity Framework (GBF).

The 2030 Strategic Framework is an evidence-based, whole of government process led jointly by Defra, BEIS and FCDO, with support from the Cabinet Office. The Government intends to publish the Framework in 2022. It will be international in focus; however, the Framework will draw on UK strengths, including relevant domestic strategies.

The 2020s are a critical decade for action on climate and nature. The effects of climate change are projected to worsen and accelerate in the next decade, putting critical ecosystems and societies at risk, causing loss and damage, exacerbating humanitarian impacts and making future adaptation and resilience more difficult. At the same time, the world is currently losing biodiversity at a much faster rate than ever before, with most indicators continuing to decline, leading to irreversible damage.

Five direct drivers of biodiversity loss currently have the largest impact: land and sea use change; overexploitation of organisms; climate change; pollution; and invasive alien species. Collectively, the first three drivers are estimated to account for >60% of biodiversity loss across terrestrial, freshwater and marine ecosystems. However, climate change, pollution and invasive alien species are all projected to accelerate in impact over the next decades.



The Paris Agreement pursues efforts to limit global temperature rise to 1.5°C above pre-industrial levels and holds the increase to well below 2°C. The latest Intergovernmental Panel on Climate Change (IPCC) report underlines the importance of limiting global warming to 1.5°C above pre-industrial levels. At COP26, nearly 200 countries agreed to the Glasgow Climate Pact to keep 1.5°C alive. However, human activities have already likely caused approximately 1.0°C of global warming, which is likely to reach and exceed 1.5°C between 2030 and 2052 if emissions continue to increase at the current rate.

The science is clear: such degradation of climate and biodiversity undermines nature’s productivity, resilience, and adaptability, and poses existential risks to our economy, resilience and wellbeing, and to delivering on the UN Sustainable Development Goals. Climate change and biodiversity loss are therefore intrinsically linked and need to be addressed synergistically to meet our climate and nature goals.

To do this, by 2030 we want to see three high level outcomes fulfilled:

Global emissions halved (from 2020 levels);

Increased adaptive capacity and enhanced resilience support sustainable development and growth;

Global biodiversity loss halted and reversed.

In seeking to influence these outcomes, we face a set of strategic choices that will guide our international action over the next decade. In making these choices, we wish to seek the views of a diverse range of stakeholders with an interest and role in protecting our planet.

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