

2010 is almost here – now what? - Options for a new vision for Biodiversity
Consultation response by Tony King, Head of Policy SWT

Comments deadline –31 July 2009

Please send completed form to Cecile Gorgerat – cecile.gorgerat@iucn.org

Page	Line	Comment
		<p>The Scottish Wildlife Trust (SWT) welcomes the opportunity to comment on the IUCN's options for a new vision for biodiversity. SWT is the largest non-Governmental body in Scotland representing all aspects of our natural heritage with over 35,000 members.</p> <p>SWT believes that biodiversity conservation can only properly be advanced by the adoption of ecosystem-based conservation objectives and strategies which enhance biodiversity by fostering robust and healthy ecosystems, taking full account of ecosystem processes and function.</p> <p>SWT has published as policy document entitled <i>Living Landscapes: towards ecosystem-based conservation in Scotland</i> outlining its approach to ecosystem based conservation a copy of which is attached and is available at www.swt.org.uk</p> <p>Whilst our overarching philosophy is best expressed in <i>Living Landscapes</i>, we do have a small number of specific comments on the IUCN's draft vision. Our comments should, however, be read in conjunction with <i>Living Landscapes</i>.</p>
1	45	SWT strongly supports improved monitoring of biodiversity and the sharing of data within and between countries. We believe that biological data sets are of great value in assessing not just biodiversity, but are sensitive to pressures reflecting climate change and can have a value beyond simply measuring biodiversity.
3	25	We agree strongly that the links between biodiversity, ecosystem services and human well-being should be expressed and would go further to say that the importance of the intrinsic, non-economic value of biodiversity should also be captured. See also our comment on p5, line 15 below.
3	27	We have a concern about shifting baselines. – 'improvement' in biodiversity might be achieved but still be in a parlous state. What we should ultimately be aiming at is to increase levels of biodiversity towards a historic reference point which is linked to the condition/health of the ecosystem being assessed
3	33	Land use and development planning and climate change policy should be included in the list of policy areas for which biodiversity is relevant.
3	36	Further detail is needed on the meaning of the word "flexible" in the context of line 36
5	15	We would urge caution when considering using measures which are explicitly market-based. Economics is inherently utilitarian and anthropocentric and while undoubtedly useful in the consideration and communication of environmental

Page	Line	Comment
		policy, it can not, as yet, capture the full range of values ascribed to non-market goods. We wish to see this area developed as a matter of priority but do, nevertheless, have reservations about the universal applicability of the language of economics to biodiversity.
6	15	Targets based on reducing the rate of loss or reducing loss are, as the draft paper points out at page 2, line 15 <i>et seq.</i> , statistically tied to the size of the population to which they refer. Whilst absolute biodiversity (i.e. genetic diversity) loss cannot be reversed on a global scale, diversity within ecosystems and regions can. SWT believes that biodiversity loss should, where possible, be reversed and that there should be added impetus given to the restoration of biodiversity in recognition of the seriousness of biodiversity loss.
6	44	As referred to in our comment (p6, line 15) above, a global target has theoretical limitations and cannot aim to <i>reverse</i> the decline in genetic diversity. SWT would welcome intergovernmental commitment to go further than reducing the rate of biodiversity loss or halting the decline in biodiversity and commit to restoring diversity wherever this is possible, aiming for robust and multi-functional ecosystems.
7	18	Government commitment as evidenced through adequate funding is key to the conservation of biodiversity. SWT is concerned that the various funding structures for biodiversity conservation at country and sub-country level make conservation initiatives vulnerable to budgetary constraints on various arms of government and without adequate priority given to the conservation of biodiversity and its monitoring by central government, measures to conserve biodiversity can be undermined.