Bee's eye view of 2019 election pledges – Full manifesto synopsis and analysis



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Contents

Ι.	Introduction	1
2.	Scope of this review	2
3.	The new Environment Act	2
4.	Brexit, non-regression and dynamic alignment	4
5.	Trade deal risks	5
6.	Global leadership on the ecological crisis.	6
7.	Funding for public goods in agriculture	8
8.	National habitat networks	9
9.	The election winner istrees	10
10.	Restoring peatlands	13
11.	Other Bee and Bug Habitats	14
12.	Rewilding	15
13.	Protected sites and National Parks	15
14.	Sustainable development, planning for nature and	16
	corporate environmental responsibility	
15.	Brownfield wildlife protection	17
16.	What of protected species?	18
17.	Climate emergency	18
18.	Pesticides safety	19
19.	Light pollution	20
20.	Cars and exhaust fumes	20
21.	Bee committed	21
22.	Closer relationship between people and wildlife	21
23.	Funding for Government nature agencies and biodiversity	23
24.	Access to environmental justice and democracy	24
25.	Comparative assessment of manifesto commitments	26

1) Introduction

As a charity Buglife is not allowed to indicate how people should vote, however bees and bugs do not have a vote, and society depends on their welfare. Buglife's aim is to halt extinctions of invertebrates and to achieve sustainable populations of invertebrates — to achieve this it is our duty to provide clear information that will enable action to be taken to address the current insect decline and ecological crisis. Here we present an impartial and non-partisan summary of all the bug relevant contents of the 2019 manifestos and election pledges. We also try to provide some additional background information where necessary to enable their interpretation.

2) Scope of this review

We cover all the manifestos of the main British parties, and have included any additional commitments produced in subsequent election documents from the parties and endorsed by their leaders. It is worth noting that as nature conservation issues are largely devolved in Wales and Scotland parties operating only in those countries can be expected to put less detail about their intentions towards nature in a manifesto relating to a Westminster election.

Manifestos can be downloaded here:

- Brexit Party
- Conservative
- Green Party
- Labour
- <u>Liberal Democrat</u>
- Plaid Cymru
- Scottish National Party

Supplementary documents here:

- Green Party
- Labour
- Scottish National Party

Buglife previously produced summaries of the 2015 and 2017 UK general election manifesto commitments that would affect bees and the other little animals that run the planet's ecosystems.

3) The new Environment Act

A new Environment Act was conceived as a vehicle to capture the environmental principles and laws that are at the heart of EU decision making. But it also offers an opportunity to significantly reset our relationship with the environment and to show that we can step up to tackle the threat of a "catastrophic collapse of nature's ecosystems" and of course the "rapid decline in the numbers of insects". Indeed a draft Environment Act that was progressing through Parliament before the election. It contained several elements – biodiversity gain in planning, conservation covenants and a refreshed biodiversity duty – that have nothing to do with EU law. Other elements such as setting statutory targets for environmental improvement and establishing an Office for Environmental Protection, would help fill gaps left by the EU, but could also fulfil important roles were we to stay in the EU.

In the 2017 election only the Liberal Democrats, Green Party, Plaid Cymru and UKIP made election commitments to introduce new legislation for nature.

This time Labour is on board and promise "We will introduce a Climate and Environment Emergency Bill setting out in law robust, binding new standards for decarbonisation, nature recovery, environmental quality and habitats and species protection", these would, they say, be "legally binding targets for 2030, 2040 and 2050, with the aim of reaching net zero by 2030 and full nature restoration by 2050", the Bill would also "establish duties on public authorities to act for the recovery of nature". In addition they would "establish the Office of Environmental Protection as an independent, fully resourced watchdog with transparent governance processes and Parliamentary accountability."

The Green Party plans have a different slant promising "a Future Generations Act for England, modelled on the current Act for Wales, building the needs of future generations into every government decision. We will also appoint a Minister for Future Generations to represent young people at the heart of government" and give "councils new powers and resources to deliver environmental improvements and increase biodiversity, as well as tackling flooding and coastal erosion locally". The Green Party also commits to legally binding environmental targets, via a "Clean Air Act, which will set new air quality standards for the UK, and a new Sustainable Economy Act, including targets for new soil quality and biodiversity standards".

This Green Party legislation would introduce:

- "New binding targets for the protection and restoration of all-natural systems including biodiversity, soil health and air quality
- Measures to encompass the environmental impact of goods and services imported to the UK as well as those produced in this country
- Strengthened EU environmental principles: the precautionary principle; the prevention principle; the rectification at source principle, and the polluter pays principle.
- A new Committee on Sustainability to advise on objectives for the restoration and protection of all-natural systems, similar to the UK's Climate Change Committee.
- A new enforcement body to hold all of government to account for the health of the environment, including the Treasury, with more extensive powers and resources than those of the proposed Office of Environmental Protection.
- New measures of economic performance to replace the primacy of GDP growth and to reorient economic decision making towards the health and wellbeing of people and the natural environment."

In preparation for the election both the Green Party and the Scottish National Party have signed up to the Greener UK pledge saying "we would support an ambitious Westminster Environment Act that sets legally binding targets (long term and interim) to clean up our air, soils, seas and rivers, enshrines a commitment, with policies, for delivery to reduce the UK's global environmental footprint and restoring nature overseas and establish an independent watchdog to hold the UK government and public bodies to account".

The Liberal Democrats, echoing their commitment in 2017, plan to "Introduce a Nature Act to restore the natural environment through setting legally binding near-term and long-term targets for improving water, air, soil and biodiversity, and supported by funding streams of at least £18 billion

over five years". They also say they would "Give the Local Green Space designation the force of law".

The Conservatives say that "Our Environment Bill will guarantee that we will protect and restore our natural environment after leaving the EU. We will set up a new independent Office For Environmental Protection and introduce our own legal targets, including for air quality.". Given the wider range of measures in the Environment Bill they introduced to Parliament, but did not pass (yet), this is a fairly slimmed down, or headline, commitment.

Plaid Cymru will "bring forward legislation to tackle the extinction crisis, placing a legal obligation on this and future governments to act for the recovery of nature. Furthermore, we will secure robust, independent governance and accountability processes to uphold the law and stand up for our environment".

Leaving the Brexit Party as the only party not committing to bring forward legislation that would address the biodiversity emergency.

4) Brexit, non-regression and dynamic alignment

The vast majority of modern environmental improvements have been made in step with countries across the continent, underpinned by EU legislation and mechanisms. Therefore there has been profound concern from the outset that Brexit, unless done very carefully, would have profoundly negative effects on the environment (see Buglife's pre-referendum <u>risk assessment</u>).

Over the last three years the environmental NGOs have worked tirelessly to secure the principle that Brexit would not mean that either the UK or the EU would go backwards on environmental protections – the Non-Regression Principle.

The UK Withdrawal Act 2018 contains some outline commitments to embed existing EU environmental law into UK law, and the Withdrawal Agreement negotiated by Theresa May enshrined a Non-Regression clause that would have committed both parties to not going backwards on environmental protections. Some of the other laws and principles have been incorporated in a draft Environment Bill with an ambitious scope, that had got to 2nd reading in the Commons before the election was called, although many in the environmental sector are convinced that some of the language in the draft Environment Bill constituted a watering down of current environmental principles.

To add to these concerns, the renegotiated Withdrawal Agreement has had the environmental Non-Regression clause removed.

In contrast Labour say "We will maintain and continuously improve the existing EU standards of environmental regulation." and would aim for "Continued participation in EU agencies and funding programmes, including in such vital areas of co-operation as the environment, scientific research and culture.". They "remain fully committed to nonregression of all environmental standards, in our

relationship with the EU and in any future trade agreement with other countries". Labour goes further still and commits to "dynamic alignment on.....environmental protections" meaning that in negotiations with the EU they would ensure that environmental progress remains in step even if we leave the EU.

Conservatives point out that "EU regulations have been another barrier to innovation", while reassuring us that they will "legislate to ensure high standards of..... environmental protection". They also state that after Brexit "This future relationship [with the EU] will be one that allows us to: Raise standards in areas like......agriculture and the environment." As in 2017 the Conservative manifesto caused concern by saying that they wanted to bring across EU environmental protections and review them later, this seems to be progress. However, the statement that they would achieve the "right regulatory balance" between "business practice" and the "environment" still jars, business is as dependent on a healthy environment as the rest of society – environmental regulation is a benefit to business rather than a constraint.

SNP will "campaign for the UK to remain aligned with EU environmental regulations even if Brexit takes place to maintain current and future EU standards and regulations in key areas like animal and plant health if we leave the EU" and also express concerns that some Conservatives have "openly said that they want to see the end of hard won rights that protect...the environment" the SNP also questions why there has been no explanation why environmental safeguards "written into the EU exit deal Theresa May" have been "removed from Boris Johnson's deal". Commitments to "campaign for the UK to remain aligned with EU environmental regulations even if Brexit takes place", "sticking to future EU emission standards" and "to maintain current and future EU standards and regulations in key areas like animal and plant health" appear to amount to dynamic alignment.

Like the SNP the Green, Liberal Democrat and Plaid Cymru parties are campaigning on a no-Brexit ticket, so from their perspective losing EU associated environmental protections won't arise; although a nod to the principle of non-regression or dynamic alignment would have clarified their position in the event of Brexit.

5) Trade deal risks

There has been growing realisation and concern that leaving the single market and setting about doing trade deals with much larger trading partners risks undermining environmental protections. Without environmental protections in trade deals measures taken here to protect the environment could simply result in the environmental impact being exported to another country. Lowering our environmental standards on the produce we accept into the country also creates economic pressures to lower our domestic farming and industry standards.

Plaid Cymru commit to "work hard to ensure that any future trade policy will uphold social, health and environmental protections." Adding that "Future trade deals undertaken by the UK, whether inside or outside the EU, should maintain and enhance environmental standards, minimise the environmental footprint of trade and make trade terms explicitly subject to environmental and human rights commitments. There should be specific protections for vital global ecosystems and

habitats such as the Amazon, and for indigenous people." To underpin this they will "publish a set of trade negotiation principles, including for labour and environment standards".

The Liberal Democrats would "Work within the EU to ensure that future trade agreements require high environmental and animal welfare standards".

The Green Party commits "that any future trade deals will maintain and enhance environmental and food standards and workers' rights, minimise the environmental footprint of trade, make trade terms explicitly subject to environmental and human rights commitments."

SNP say their MPs will "never engage in a race to the bottom and will seek to prevent the sell-out of Scotland's environment to any dodgy trade deal."

Meanwhile the Conservative promise that "In all of our trade negotiations, we will not compromise on our high environmental protection, animal welfare and food standards.".

Labour say that they have "consistently upheld a principle that any new relationship with the EU and other trade arrangements must not undermine the progress achieved on.....environmental quality standards." and that "any new relationship with the EU and other trade arrangements must not undermine the progress achieved on food safety, animal welfare or environmental quality standards.". They go on to explain that "We will pursue trade frameworks within or without the EU that match our own environmental standards, comply with international environment law and protect biodiversity in partner countries. We will not export our climate impacts or polluting waste to the Global South." And were that not enough they add that "We will uphold the highest environmental and social regulations in all our trade relations, and will never downgrade standards as 'barriers' to trade".

The only Brexit Party manifesto commitment on trade is to reduce import tariffs on goods, including food.

6) Global leadership on the ecological crisis.

The Conservative Party sets out its stall on providing leadership on the environment saying "We will set up new international partnerships to tackle deforestation and protect vital landscapes and wildlife corridors. We will establish a new £500 million Blue Planet Fund to help protect our oceans from plastic pollution, warming sea temperatures and overfishing".

Labour says that "Our international leadership will extend to the setting of global targets for biodiversity and nature restoration, to be agreed in China in 2020. Delivering ambitious actions here will give added legitimacy to our leadership role on the international stage". They would "work with allies in the Arctic Council to seek a new Arctic Ocean Treaty. In the OSPAR Convention Area we will cooperate to reduce the pollution of our shallower seas by taking measures to reduce waste and complex chemical pollution accumulations". In addition Labour would "lead the campaign for environmental justice on the international stage, including ensuring we honour the obligations of

international agreements like the Biodiversity Convention's Aichi Targets [and] the Paris Agreement on Climate Change".

The Liberal Democrats would "Argue for ambitious new legally binding international targets to protect global biodiversity, and an effective global oceans treaty to create a network of ocean sanctuaries. We will also provide greater resources for international environmental cooperation, particularly on actions to tackle illegal and unsustainable trade in timber, wildlife, ivory, and fish" they would also "Create a new 'British Overseas Ecosystems Fund' for large-scale environmental restoration projects in the UK Overseas Territories and sovereign bases, home to 94 per cent of our unique wildlife".

The Brexit Party would "promote a global initiative at the UN" (?).

Plaid Cymru would:

- "Legislate to end the importation of goods that have caused deforestation".
- "Invest in Overseas Development Aid that supports a transition to ecologically friendly farming".
- "Require that imported palm oil comes from sustainable sources".
- "Ban imports of soy, beef and other agri-commodities from illegally deforested land".
- Support "an immediate moratorium on deep sea mining. All further activity within UK exploration contracts should be halted".

The Green Party would "Seek to make the combatting of climate and ecological breakdown and the spreading of human rights and justice core purposes of the United Nations." and would "Champion a treaty which establishes the Arctic, Antarctic and Amazon as World Nature Reserves. In these new reserves, commercial exploitation of natural resources would be banned and the rights of indigenous populations protected".

SNP MPs would "call for the UK government to redouble its efforts to tackle the international development challenges stemming from climate change, and to follow the lead of the Scottish Government by introducing a dedicated Climate Justice Fund.".

On creating a global blue belt of protected marine reserves all parties apart from the Brexit party and SNP declare a policy, the ambition of which varies:

- Conservative Party "extend the Blue Belt programme to preserve the maritime environment. We will continue to lead diplomatic efforts to protect 30 per cent of the world's oceans by 2030",
- Liberal Democrats "establish a 'blue belt' of marine protected areas covering at least 50 per cent of UK waters by 2030, in partnership with UK overseas territories",
- Greens "work with British Overseas Territories (BOTs) to increase the 'blue belt' protecting BOTs' waters from commercial extraction, from the current 32% of coverage to 50%,",

- Labour "co-operate with our overseas territories to extend Blue Belt provisions in oceans around the world" and "lead the global effort for a UN Ocean Treaty creating a network of marine sanctuaries in 30% of the world's oceans", and
- Plaid Cymru "a strong UN Global Ocean Treaty capable of creating a network of ocean sanctuaries covering at least 30% of oceans by 2030".

Several parties also commit to promoting the UN Sustainable Development Goals:

- SNP "press the UK government to act on" the Sustainable Development Goals,
- Green Party "make supporting the United Nations' Sustainable Development Goals a priority",
- Liberal Democrats "promoting the UN Sustainable Development Goals both in the UK and abroad", and
- Labour "ensuring we honour the obligations of...the UN's Sustainable Development Goals".

7) Funding for public goods in agriculture

UK farming subsidies amounting to £20 billion per year, of which agri-environment payments to help farmers look after wildlife are c.£3 billion are open to radical change in most Brexit scenarios. In particular there is a widely held belief that it is better to provide funds that support the provision of public goods and services – i.e. goods and services that cannot be owned and monetised – that benefit society, rather than simply paying support to landowners on a per hectare basis.

The Conservatives say "Once we have got Brexit done, we will free our farmers from the bureaucratic Common Agricultural Policy and move to a system based on 'public money for public goods'....In return for funding, they must farm in a way that protects and enhances our natural environment".

Plaid Cymru have always taken a contrasting approach, proudly stately in 2015 that it has "opposed the maximum transfer of funds" to deliver environmental objectives, and now claiming that Labour would "follow the UK Conservative Government by phasing out direct payments to farmers and establishing a new environmental land management system. Meanwhile, farmers in Scotland, Northern Ireland and the rest of the EU 27 will retain direct payments, creating an unlevel playing field for Welsh farmers and undermining the viability of their businesses."

The Brexit Party say they would "Maintain subsidies and grants paid by the EU to UK businesses such as farmers". Which, as the EU subsidies are in flux themselves, leaves us none-the-wiser as to whether they will take a public goods approach as favoured by the Conservatives or the direct payment per hectare of land approach advocated by Plaid.

The Liberal Democrats would "Reduce basic agricultural support payments to the larger recipients and redeploy the savings to support the public goods that come from effective land management, including restoring nature and protecting the countryside,"

While "A Labour government will maintain agricultural and rural structural funds but repurpose them to support environmental land management and sustainable methods of food production."

SNP are more focussed in this election with making sure that the UK passes on all the funding due to Scottish farmers, than with how that might be spent in Scotland.

The Greens say that "As a member of the EU we will press for a review of the Common Agricultural Policy, so that it is focussed on supporting UK and other EU farmers as they make the transition to sustainable farming".

Organic farms usually support greater numbers of insects than other systems and both the Green Party and Plaid Cymru indicate they will provide additional support to organic farming, while Labour would promote organic orchards.

8) National habitat networks

Developing a national network of wildflower meadows is an <u>essential step</u> to halting and reversing the decline of bees and other wildlife. <u>Recent research</u> has confirmed that insect species are failing to keep track with climate change because their habitats are too fragmented. Given how much climate change is already locked into the next 30 years it is urgently important that a network of wildflower meadows is established to give the stuck species a fighting chance.

Habitat networks were a commitment in both the Conservative and Liberal Democrat 2010 manifestos, and the May 2010 coalition agreement committed the Government to "introduce measures to protect wildlife and promote green spaces and wildlife corridors in order to halt the loss of habitats and restore biodiversity." This commitment was not fulfilled and was dropped from the 2015 Conservative and Liberal Democrat manifestos, although the Labour Party did promise to "ensure the development of coherent ecological networks to protect wildlife and reverse the decline of pollinators.". However in 2017 the Green Party was the only party to retain a commitment to a national wildlife network.

Thankfully in 2019 habitat networks are back in strength, in addition to the Green Party commitments to urban "bee corridors" and "joining up the wild spaces nature needs to thrive", the Labour Nature Manifesto envisages "nature-friendly corridors joining all these places with each other", "corridor meadows along new or re-opened rail tracks" and "urban parks and green spaces.... linking into nature recovery corridors".

Wildlife corridors are also in vogue in the Conservative manifesto that takes a global perspective "we will set up new international partnerships to tackle deforestation and protect vital landscapes and wildlife corridors." While the Liberal Democrats take a watery perspective promising to "create a network of ocean sanctuaries".

9) The election winner is.....trees

Trees are the nature big winner of the election, in 2017 ancient woodlands were promised greater protection from development, but this year there is a race to plant the most trees.

Clearly woodland is good for invertebrates, or at least better than low nature value farmland, but it should be noted that most of the endangered species that depend on woodland are actually dependent on a couple of habitat features, namely dead and decaying wood and flower rich rides and areas of coppice. The features of most importance to insect conservation are not generally found in brand new woodland. Indeed, if the wood is planted with non-native conifer species it will never provide valuable bug habitat. Another concern is, inappropriate planting, for instance we often see trees planted on wildflower meadows, so a habitat that is providing for bees is replaced by one that is not. Finally, the importation of live trees in soil is a massive biosecurity risk, we have already imported Dutch elm disease, the Horse chestnut leaf miner, Knopper galls, Ash die back and the Zig-zag sawfly species that put at risk most of our wild trees. Planting trees while spreading diseases that will wipe them out is a nonsense, in 2018/19 3,800 hectares of woodland had to be felled because it was infected with invasive species. In this context, it is concerning that, unlike previous elections, none of the manifestos address the growing problem of invasive species (apart from a passing mention of Grey squirrels by Labour) and there is no mention of the urgent need for improved biosecurity.

Many people question why outside forestry plantations we need to plant trees at all? Why not just stop the destruction of trees that are trying to grow and allow natural regeneration to occur? This may well produce better habitats for insects, and would reduce the rate of planting required, creating instead wardening jobs with a higher degree of work complexity and satisfaction.

There are some woodland habitats that could directly help the bees, particularly if they include flowering trees and shrubs, such as sallow, lime or rowan. These could be created with careful restoration wardening rather than planting.

While more trees will helpfully lock up carbon and mitigate climate change, whether they really contribute directly to halting insect declines is a matter of 'the right tree in the right place'.

While the manifestos make great play of the number of trees they will plant, between 2006 and 2015 on average 364 hectares of woodland were lost each year, mostly to development (Forestry Research <u>statistics</u>), a figure that may be rising given the growing impact of invasive disease causing species (although some areas that are felled due to invasive species are then replanted, so would not contribute to the loss statistic). It is likely that unless planning rules are changed commitments to big increases in the areas of roads, railways and housing, as proposed in most of the manifestos is also likely to considerably increase this woodland loss figure.

Labour say that they will "invest £2.5 billion over its first term to plant 300 million trees in Britain, with a target of reaching one billion new trees planted across Britain by 2030, and two billion by 2040." They also indicate that there will be some focus on the right trees in the right place "We will plant mixed native woodlands and enlarge commercial forestry" and "We will first identify

environmentally degraded sites for mixed woodland plantings of native trees in the one quarter of England that is covered by designated landscapes.".

The Conservatives "will reach an additional 75,000 acres of trees a year by the end of the next Parliament" and "will expect all new streets to be lined with trees". They add "as well as restoring our peatland." without making clear if this is by-the-by or a linked point to make it clear that they are going to avoid the trap the Taoiseach Leo Varadkar recently fell into when he announced that he would be planting "Over 600,000 native trees....on unused bogland". An action that people were quick to point out would release more carbon dioxide than it would store.

The Brexit Party will be "planting millions of trees to capture CO2".

SNP "will press for an increase in new woodland creation, working towards a target of 60 million trees planted annually in the UK by 2025, with 30 million of these in Scotland to help tackle the Climate Emergency and to support biodiversity and rural employment. We will share Scotland's success in this area in an effort to drive up planting rates across the UK."

The Greens would "Plant 700 million new trees and aim for 50% of all farms to be engaged in agroforestry by 2030", and would encourage both "the planting of more trees in more towns and cities, including apple, nut and other crop trees than can produce food." and "street planting of native trees".

The Liberal Democrats have upped their tree ambition to "planting 60 million trees a year to absorb carbon, protect wildlife and improve health."; a massive increase on their 2017 commitment of "aiming to plant a tree for every UK citizen over the next 10 years."

Plaid Cymru only commit to a tree planting target in Wales "new woodland planted has been less than 1,000 hectares a year, and in some years has been below 500 hectares. We should aim for a minimum planting rate of 2,000 Ha a year from 2020". As the figure for new woodland planting in Wales was 520 Ha in 2018/19 this would require 1,480 new Ha of Welsh woodland per year from 2020.

Unfortunately the commitments are not directly comparable and do not all set clear timescales or end points. A hectare supports about 1,000 mature trees. While trees can be planted at densities of up to 2,500 per Ha, most of the trees will not all survive to maturity, so their contribution to carbon storage and biodiversity is ephemeral. Using 1,000 trees per Ha as a rule of thumb we can convert the commitments into equivalent statistics. In the case of the Conservatives, their commitment is to plant 30,000 Ha in addition to the current planting area of 28,520 Ha, therefore in 2023/4 they would be planting at least 58,500,000 trees, while the Labour targets of 300 million trees by 2024 and one billion new trees by 2030means that they will be planting at least 116,700,000 trees in 2030.

Table 1. Approximate tree planting commitments -based on 1,000 trees/Ha and including replanted forestry as well as new woodlands where appropriate, estimated figures in italics.

Party	2023/4 Planting target (million trees/yr)	Area of new land needed by 2023/4* (1000 Ha)	Total number planted by 2030 (million trees)	Max trees planted per minute (120K working mins in year)	Total new area planted by 2030* (million Ha)
Labour	60	222.6	1000.0	972	0.83
Green	63.6	240.8	700.0	530	0.53
Lib Dems	60	222.6	660.0	500	0.49
Conservatives	58.5	155.1	583.5	488	0.41
SNP	49.5	143.9	581.3	500	0.41
Plaid Cymru**	30	72.6	330.0	250	0.16
Brexit Party***	19	17.6	209.0	158	0.04
	Estimated	Total new	No. trees	Max trees	Total new area
	no. trees	area planted	planted by planted per		planted by
	planted	by 2023/4 at	2030 at this	minute	2030 at this
	(millions)	this rate	rate		rate
2018/19****	28.5	65.1	313.5	238	0.14
1989 *****	44.1	N/A	N/A	368	N/A

^{*} Assuming that area of forest replanted (not new) stays static at 15.12 thousand Ha/yr.

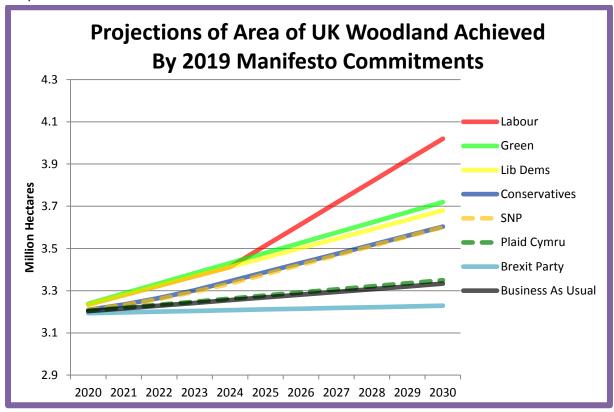
^{**} Wales only commitment, assumed in addition to UK 2018/19 baseline.

^{*** &}quot;Millions" interpreted as less than 10s of millions, i.e. 19 million.

^{****} Forest Research statistics

^{****} highest ever planting year - 44.1 thousand Ha

Graph 1.



Note: assumes 1) 1,000 trees per Ha, 2) commitments continue linearly until 2030 when not otherwise stated, 3) 15.12 thousand Ha of restocking and 0.36 thousand Ha of woodland loss every year, and 4) no increase in woodland loss. Plaid Cymru commitment relates to Wales only.

The current area of woodland in the UK is 3.19 million Ha, this equates to 13.1% of the UK landmass, under the most ambitious of commitments the figure would rise to 4.02 million Ha in 2030, or 16.5% of the land surface. Under the least ambitious proposal the area of woodland would actually be 100,000 Ha less than the 'business as usual' estimate for 2030 - unless of course the Brexit Party wording means they will plant tens of millions of trees, not just 'millions' of trees. On Sunday Politics East Midlands (BBC1 8 December 2019) Brexit Party parliamentary candidate Alan Graves stated that their target was to only plant "one new million trees" — which, assuming he meant annually, would result in either a tiny 600 Ha a year increase in woodland cover, or a massive 12,500 Ha reduction by 2030, depending on how "new" is interpreted i.e. in addition to current area planted, or where there were previously no trees..

10) Restoring peatlands

There is over <u>twice</u> as much carbon stored in UK peat soils than in woodlands, but the wetland soils are drying out or being sold in bags in garden centres and the peat is turning back into carbon dioxide. Restoring peat is not only essential to mitigating climate change, it is also essential to conserving the threatened wildlife found in these sensitive habitats.

Several parties have woken up to the problem and are making commitments to:

- "Invest in peatland restoration and end both the burning of peatlands and use of peat in compost in horticulture. We will advocate an emergency international agreement to conserve and enhance carbon sinks and reservoirs includingpeat fields" – Green Party
- "restoring our peatland" Conservatives
- "restore degraded peatlands to their natural state we will end the harvesting of peat and the burning of moors or blanket bog." - Labour
- "Invest in large scale restoration of peatlands" Liberal Democrats

The SNP do not mention peatlands, despite having much of the UK resource, more worryingly on the Planet Earth leaders debate on Channel 4 on 28th November the SNP leader Nicola Sturgeon, while recognising the crucial importance of peatlands also appeared to be under the wild misapprehension that peatlands in Scotland are never deliberately burnt, a statement that could barely be further from the truth.

Plaid Cymru don't specifically mention peat but it is inferred when they talk of preventing flooding by managing "water retention in the uplands".

It is concerning that despite having recently managed flooding events the Conservatives only mention spending "£4 billion" on new "flood defences", with no mention of investing in habitats to mitigate flood risk.

11) Other Bee and Bug Habitats

Trees and peatlands don't quite get all the attention; there are some notable mentions of other important invertebrate habitats.

Labour promises it will "improve upstream river management", "restore and enhance our water environments with actions to ensure 50% of England's rivers and lakes meet the standard of good ecological status by 2027" and talks extensively of the importance of grasslands "essential to sustain insect and bird life....among our most biodiverse habitats....more than 30 kinds of wildflower" and commits to invest in their restoration.

Salt marshes also get a look in, Labour would use "nature based solutions, such as managed realignment, to restore our salt marshes and mudflats", while the Liberal Democrats would "Invest in large scale restoration ofsaltmarshes, wetlands and coastal waters, helping to absorb carbon, protect against foods.

The Liberal Democrats would also "Protect and restore England's lakes, rivers and wetlands, including through reform of water management and higher water efficiency standards".

The Green Party would "Encourage the expansion and replanting of majority of hedgerows lost in the last 50 years through new subsidies".

12) Rewilding

Rewilding habitats has the potential to restore healthy invertebrate populations to some denuded landscapes, it gets mentioned in three manifestos.

Labour would "Encourage, through changes to the planning system, the 'rewilding' of spaces to provide new habitats for wildlife". While the Liberal Democrats would pilot "'rewilding' approaches". The Green Party would "Invest in ecotourism and associated schemes such as rewilding", would use rewilding "to reduce carbon emissions and realise the land's ability to absorb carbon" and would, "where possible", rewild "artificial landscapes designed only for hunting (such as grouse moors)".

13) Protected sites and National Parks

Sites of Special Scientific Interest are the bedrock of nature protection in Britain, but they are increasingly in bad condition, are not regularly monitored any more, and many of our most important sites for endangered species sit outside the protected sites system. A <u>review</u> of the National Park series in 2019 found that the designation was precious but the system was failing to deliver effectively.

Labour are ambitious about protected sites promising to "consider strengthening the management requirements for all existing protected sites and assess the case for establishing new sites to protect more vulnerable habitats." they would develop site specific "management plans and rigorous targets for either nature restoration or carbon sequestration, or both". Labour would also "review and improve protected area designations, from National Parks to local nature reserves and urban green spaces" while "ensuring more people can enjoy living closer to nature".

The Green Party would "StrengthenSites of Special Scientific Interest protections" allowing their destruction "only ... in exceptional circumstances".

The Liberal Democrats would introduce a new "National Nature Park" designation, but do not explain how this would improve the protection of biodiversity.

Labour would create 10 new National Parks "with an annual budget rising to £50 million" and for existing National Park authorities would "increase the funding ...by 50%, almost £75m each year".

The Conservatives would also "create new National Parks and Areas of Outstanding Natural Beauty, as well as making our most loved landscapes greener, happier, healthier and open to all".

In National Parks the Green party would "Ban mineral extraction, road building and military training" and would create "new democratically elected positions on National Park boards.

In the seas Labour would "extend the network of marine protected areas (SACs)", the Green Party would significantly increase current protection levels, making "at least 30% of UK domestic waters

into fully protected marine protected areas by 2030" and the Liberal Democrats would "establish a 'blue belt' of marine protected areas covering at least 50 per cent of UK waters by 2030".

14) Sustainable development, planning for nature and corporate environmental responsibility

Much harm to endangered species and ecosystems is caused by the actions of companies and corporations. Often it seems that lower standards and expectations are applied to them than to public bodies and charities. While there are many companies that are trying to pull their weight, they can be undermined by bad actors, this is why it is essential that regulation is used to establish level playing fields. There are several measures proposed to reduce the environmental damage arising from business activities.

The Labour Party is proposing changes to the planning system to reduce the damage to wildlife caused by development. "review the development consent and planning laws to consider post-development nature restoration requirements, such as establishing new nature reserves in disused quarries, corridor meadows along new or re-opened rail tracks, requirements to include insect bricks in housing developments." They go on to detail a review of how environmental impacts are assessed, avoided and mitigated; apparently suggesting (correctly) that the quality and the delivery of impact assessments may be better delivered by Local Authorities rather than developers. Finally Labour would engage the "public and experts" to revise "national guidance standards" for planning.

Plaid Cymru promise to "reform planning law to provide greater protection for green spaces in urban areas". However, Plaid Cymru has a paradox in their manifesto, on one hand saying that "We must act swiftly and with determination if we want to halt the effects of the ecological crisis on our wildlife and begin to see recovery", while on the other promising to enable the building of "Tidal Lagoons for Swansea Bay, Cardiff and Colwyn Bay" and "an Usk barrage", schemes widely considered to be likely to cause significant harm to wildlife. However, they will produce a "Welsh Energy Atlas" that "will show where different forms of energy resources would have the least ecological impact, as well as potential sites for nature redevelopment and conservation".

The Green Party plan to devolve development targets to local authorities and would "Amend the National Planning Policy Framework so it no longer imposes centrally set development targets", but would require them contribute to a national target "of at least 100,000 new council homes a year.....in a way that preserves local ecology and creates new green spaces.

The Liberal Democrats would "ensure that the National Infrastructure Commission takes fully into account the climate and environmental implications of all national infrastructure decisions".

On promoting corporate responsibility there are a range of measures proposed.

Labour "will change the criteria a company must meet to be listed on the London Stock Exchange so that any company that fails to contribute to tackling the climate and environmental emergency is delisted" and would "make companies legally accountable for failing to prevent..... environmental damage in their operations".

The Liberal Democrats would "establish a general corporate duty of care for the environmentrequiring companies, financial institutions and public sector agencies to exercise due diligence in avoiding specified activities...., or specified products such as commodities produced with deforestation, in their operations and supply chains, and to report on their actions" and would "reform fiduciary duty and company purpose rules to ensure that all large companies have a formal statement of corporate purpose, including environmental standards, and that they report formally on the wider impact ..[on]... the environment".

SNP state that "environment cannot continue to suffer the impact of unrestricted economic growth" and would "further support the growing trend in the private sector towards greater corporate responsibility".

The Green Party would "Require UK corporations to abide by the environmental, labour and social laws of their own country and of the country in which they are operating – whichever are the more stringent – and advocate for other corporations to do the same" and would "require water companies to invest in water conservation".

15) Brownfield wildlife protection

For pollinators and many other endangered species the destruction of sites through development remains a significant cause of declines and localised extinctions. One complication is that while many think of brownfield sites as being ideal places to develop, in practice the definition of brownfield includes many sites that abound with rare species and are key to conserving wildlife. Often the wildlife importance of brownfield sites is not adequately weighted in the planning process resulting in some of the most damaging planning decisions in the last decade (see this blog for more info).

Several parties want more focus on building on Brownfields - Labour and the Conservatives want to prioritise it, the Brexit Party would simplify planning consent, and the Greens propose that their Land Value Tax would bring more into use. Indeed a Land Value Tax would put biodiversity and other environmental services at acute risk were they not treated as reasons for exemption from the tax.

The Lib Dems have dropped their 2017 mention of brownfield development, but are proposing to "replace Business Rates in England with a Commercial Landowner Levy based solely on the land value of commercial sites rather than their entire capital value" which may similarly to LVT increase risk of development on biodiverse brownfield sites.

For bees and bugs the priority with development is to avoid destroying precious wildlife, so increasing brownfield development without caveating this with 'while protecting wildlife' amounts to a negative mention. Only the Labour party escapes this by mentioning turning quarries into nature reserves and recognising the "imminent insect catastrophe that is risked" by the development of the massively important brownfield site at Tilbury Marshes, given planning

permission for a new port despite nationally significant populations of rare bumblebees and 30 other rare types of animal. More on Tilbury <u>here</u>.

16) What of protected species?

Endangered and threatened species can hope to be helped by being listed under two forms of legislation in the UK. Species listed under the Wildlife and Countryside Act 1981 and parallel laws in Wales, Northern Ireland and Scotland can be protected from the destruction of their places of shelter, from taking and from killing, while species listed under the Natural Environment and Rural Communities Act 2006 and related biodiversity legislation in Wales and Scotland have to be taken into consideration when public bodies take decisions and undertake their functions (biodiversity duties).

The process for listing species to protect them from having their habitat damaged and/or being killed is currently in crisis as the UK governments failed to respond to the last set of listing recommendations made by the Joint Nature Conservation Committee in 2014, meaning that several species that are being driven to extinction are not receiving the protection for which they qualify.

Meanwhile the biodiversity lists were thoroughly updated in 2007, but while some species are still subject to conservation programmes, progress to stop many species has stopped or not yet started, indeed former recovery targets have now all been dropped.

A <u>House of Lords inquiry</u> in 2018 determined that biodiversity duty in England is ineffective and unenforceable. The Environment Bill that was being progressed before this election contained new wording that would have strengthened the biodiversity duty and improved reporting, but it would not apparently have made a clearer link to the recovery of the listed species, or introduced associated targets.

None of the manifestos mention protected species which is a concerning omission.

17) Climate emergency

There are even more commitments relating to halting the climate emergency, than the nature emergency, perhaps understandably given the imminent threat it presents. Halting climate change is very important for bees and all invertebrate groups. Climate change is making their current homes inhospitable and most species are struggling to move north to stay in habitable latitudes. Many of the parties make complex commitments on the climate and we will not repeat the more detailed work of others analysing this, see the Carbon Brief analysis here and the Greenpeace analysis here.

18) Pesticides safety

In 2015 the Green Party was the only party to commit to ban neonicotinoid insecticides, but by 2017 they had been joined by Labour and the Lib Dems, later in 2017 the Conservative Party joined the consensus and thankfully the persistent seed treatments that were causing such awful harm to our wildlife were banned and will hopefully now largely disappear from soil, water and flowers, creating a safer environment for bees and other pollinators.

However, despite this progress there is stalemate at the heart of Europe on preventing this pesticide calamity from happening again. At the moment the Member States have been refusing to implement the scientific guidance that the European Commission proposed in 2013. In frustration at the lack of progress the European Parliament recently voted, a thumping 533 to 67 in favour of protecting bees, and they have sent the EC back to put in place better protections for bees. You can read more about this here.

Whatever happens with Brexit there is much that must be done to protect wildlife from new and existing pesticides, the use of which has been increasing alarmingly in recent years. Unlike 2017 when all the parties ducked this issue, in 2019 both Labour and the Greens have set out their intentions.

Labour would: "consult to set appropriate targets for the reduced use of harmful pesticides and fungicides and adopt the precautionary principle in regulations. We will provide more support to sustainable farming methods with less reliance on chemicals...... We will trial integrated pest management systems and support varietal trials to help farmers reduce reliance on harmful chemicals and deliver healthier soils, as well as cleaner water and thriving natural systems".

The Green Party would: "Reduce pesticide and fungicide use by at least 50% by overall weight by 2022, phase out all non-agricultural uses of pesticides, and immediately ban the most harmful substances. We will secure protection of rural residents and communities from exposure to pesticides sprayed on nearby crop fields and prohibit the use of pesticides in the locality of homes, schools and children's playgrounds. We will strengthen the role of independent scientific advice and the application of the precautionary principle in the pesticide regulation and monitoring process – only pesticides that pass strict tests, and demonstrably don't harm bees, butterflies and other wildlife, will be approved for use in the UK."

Phasing out of non-agricultural use of pesticides is already underway in France and would have wide support amongst environmental NGOs in the UK. The proposal to include butterflies in the testing of new pesticides is a significant step forwards as currently the impact of new pesticides on butterflies and moths is ignored. In addition the Green Party proposal to force Member States to be transparent about their voting positions in the EU pesticide committee would improve democratic control of pesticide use.

While persistent neonicotinoid insecticides have been banned in agriculture, one of them is still used in flea treatments for pets and appears to be causing serious pollution to rivers (report here). These flea treatments are highly toxic to insect life, raising a question mark over Labour's encouragement

that "Anyone with a pet can collect groomed fur and leave it in tree hollows for birds to use it in nest building". If you have used a flea treatment in the last few months please don't release fur into the environment.

19) Light pollution

There is growing evidence that levels of light pollution are having an increasingly profound effect on our ecosystems, including damaging aquatic life and stopping nocturnal pollination services. A recent summary of the scientific evidence makes it clear that urgent action is needed.

Despite a Government <u>commitment</u> in 2011 to "to reduce the negative impacts of artificial light", there has been no progress, and indeed bright white LED street-lighting has been rolled out in many areas with little consideration for the other animals who have to live there.

At this election only one party mentions the problem, the Labour Party recognises that "artificial light pollution [is among the] significant drivers of the insect population collapses". This is an issue to watch for future elections, if we are serious about halting the biodiversity crisis then it has to come up the agenda and light pollution reduction targets will need to be set.

20) Cars and exhaust fumes

Cars impact of bees and other insects in four main ways.

Firstly, pollinators locate flowers by following small quantities of volatile chemicals released by the flowers, but these are destroyed by engine fumes, disrupting both plant-insect and plant-plant communication, and reducing pollinator foraging efficiency. For ozone this impact has <u>been shown</u> to occur at levels of 80 and 60 ppb.

Secondly, nitrate pollution emitted by cars fertilises roadside verges and nearby habitats making them less rich in flowers, bees and biodiversity.

Thirdly, road verges can be great habitats for insects, but where traffic is high and verges narrow the proportion of the pollinator population that ends up being killed by passing vehicles is worryingly high.

Fourthly, roads can destroy invertebrate habitat when built and then become a block to dispersal, preventing invertebrates, particularly small and flightless ones from moving around the countryside. As yet, unlike on the continent, we do not routinely construct wildlife bridges to mitigate the fragmenting effect of roads. The Labour Party comes close when they say that they will include "modifications like badger tunnels under any new roads", but tunnels are not a patch on bridges!

A number of the manifestos contain strong measures such as supporting the use of electric vehicles that should reduce pollution levels near roads, or measures to reduce car use, such as promoting

public transport. The Conservative manifesto also contains a commitment to make "a £28.8 billion investment in strategic and local roads", in contrast the Green Party promises to stop building roads.

21) Bee committed

The large section on insects in the Labour Party's "A Plan for Nature" is a remarkable milestone in the recognition of the importance of halting insect declines. As well as detailing the essential roles of insects, and their currently imperilled state, the plan includes case studies of endangered species, including the Wart-biter cricket, Cosnard net-winged beetle (a deadwood inhabitant) and New Forest cicada. The section concludes that "Unless we change our ways of producing food, insects as a whole will go down the path of extinction in a few decades. The repercussions this will have for the planet's ecosystems are catastrophic."

In 2015 four of the main political parties mentioned bees in their manifestos, and three did in 2017. In 2019 only the Green party specifically mentions bees — "only pesticides that pass strict tests, and demonstrably don't harm bees, butterflies and other wildlife" and introducing "bee corridors" to urban areas. However, the bees should not feel too neglected by this as policies that should help them do abound in several of the manifestos; indeed the Labour Party manifesto even contains a big picture of a beautiful bumblebee.

Figure 1. Bumblebee featuring in Labour Party manifesto.



A Labour governmen Green Industrial Revolution is complemented by We are facing a climate and environment emergency, and unlike the Tories we will not trade our environment in pursuit of reckless trade agreements.

Labour will review and improve protected area

22) Closer relationship between people and wildlife

It is essential that we improve our relationship with wildlife, including science to understand its needs, education to foster understanding and access to wildlife rich areas so that people can regularly benefit from experiencing biodiversity up-close. These actions will foster more engagement with the problems facing the natural world and a greater willingness to resolve them.

Labour would "work with community and volunteer organisations, schools and youth services to ensure young people are provided with educational access to the countryside and to farmlands, and with the opportunities to understand the connected role of urban green spaces, allotments and nature corridors in the places where they live" and would "commit to a new strategy for our urban parks and green spaces to unlock their potential for people and nature by integrating green space management with health priorities, biodiversity targets and by linking into nature recovery corridors".

Labour would also elevate "public awareness of environmental interactions......an effective, comprehensive programme of public education" starting in schools, where "Pupils will learn both the sciences and the urgency of the climate and environment emergency, and they will acquire the skills necessary to deal with it and to thrive in the careers provided by our Green Industrial Revolution". To achieve this they "will co-operate with NGOs and their awareness campaigns and activity programmes".

The Green Party would "Launch a public information campaign to educate the public about the biodiversity loss and other Climate Emergency threats we face, and encourage the behaviour change needed in response", they would introduce "an English Climate Emergency Education Act to support schools to teach young people about the urgency, severity and scientific basis of the climate and environmental crises", would "enable more outdoor lessons, where children will learn more about nature, animals and the environment" and would "Create a Nature GCSE to encourage children to value nature, and to grow a whole new generation of naturalists".

The Liberal Democrats would "Introduce a 'curriculum for life', in all state-funded schools. This will include.....environmental awareness".

While Labour's planning process review would ensure "access for residents to green open spaces", they also "envisages the creation of many more options for leisure and recreation".

The Green Party sets out extensive measures to improve access to nature, including:

- "Encourage the creation of new green spaces....from pocket parks on vacant land, to living green roofs and walls".
- "Encourage urban gardeners to plan for wildlife opting for grass and shrubs over paving in a garden can create vital new habitats for wildlife".
- "Recognise access to diverse nature as a human right and uphold it across society".
- "Restore access to the countryside by re-opening lost public rights of way and creating new ones".
- "grant to people in England and Wales the same right to roam over all landscapes as people in Scotland currently enjoy".
- "protect and enhance access to inland waterways".
- "Open up car-free access to the National Parks with new cycling, walking and bus links".

The Conservatives would "make our beautiful countryside more accessible for local community use", including making "the coast to coast path....a National Trail".

The Liberal Democrats would "Significantly increase the amount of accessible green space, including protecting up to a million acres, completing the coastal path, exploring a 'right to roam' for waterways and creating a new designation of National Nature Parks" and would "Give the Local Green Space designation the force of law".

On Science the Conservative promise to "improve the use of data, data science and evidence in the process of government, while Labour would "ensure the most recent scientific understanding is taken into account".

Labour would increase "investment in the Environment Agency's water monitoring and project implementation programmes".

The Green Party would "Develop a soil health monitoring programme for England, to match those in Scotland and Wales, to assess and understand changes in the health of soil over time".

The Conservatives would "make the UK the leading global hub for life sciences after Brexit". Technically this includes ecology and all branches of biology, but in recent years the term has been used as political shorthand for medicine, pesticide science and genetics.

The Liberal Democrats would "Increase national spending on research and development to three per cent of GDP.... via an interim target of 2.4 per cent of GDP by no later than 2027". Hopefully, some of this would be directed towards environmental science.

23) Funding for Government nature agencies and biodiversity

Few if any areas of Government work have been harder hit by austerity than nature conservation and monitoring of environmental health. Finally the wind seems to be changing with commitments to restore funding to the Government's statutory agencies:

- Liberal Democrats "Increase the budget for the Department for the Environment, Food and Rural Affairs, ensuring that agencies such as Natural England and the Environment Agency are properly funded.";
- Green Party "Increase funding for the Environment Agency and Natural England, to support the vital work they do to protect our environment."; and
- Labour "We will fully fund the Environment Agency and other frontline environment agencies", "Labour will boost the funding to Defra agencies and arms-length bodies by a combined annual total of £70m, to be focused on securing additional environmental science research, monitoring, evaluation and advice to government. Natural England will receive more than half of the additional funds to deliver expanded and restored monitoring and evaluation of the natural environment. Our selection and designation of candidate sites for nature restoration, carbon storage and biodiversity net gain will be evidence based. Significant funding increases will also be made available to the Environment Agency, JNCC and CEFAS."

Given that the Conservative Party is strong in England and has been in power while the dire funding crisis at Natural England has become fully apparent, it is concerning that there is no mention in their manifesto of restoring its funding.

These are not the only funding commitments that may benefit bees and biodiversity. Several of the manifestos making significant additional funding commitments, although the detail is not there to know how much of this funding will be available to save endangered species, as compared to, for instance, being spent developing new climate technologies.

The Conservatives promise they would "invest in nature, helping us to reach our Net Zero target with a £640 million new Nature for Climate fund." and would "establish a new £500 million Blue Planet Fund to help protect our oceans from plastic pollution, warming sea temperatures and overfishing". In addition the Conservatives would "prioritise the environment in the next Budget" "investing in R&D; decarbonisation schemes; new flood defences, which will receive £4 billion in new funding over the coming years; electric vehicle infrastructure including a national plug-in network and gigafactory; and clean energy."

While Labour would set up a "£250 billion Green Transformation Fund dedicated to renewable and low-carbon energy and transport, biodiversity and environmental restoration." as well as committing to "Continued participation in EU agencies and funding programmes, including in such vital areas of co-operation as the environment, scientific research and culture." They would also "ensure that either the British contributions to this fund or the British receipts from this fund will also continue to be maintained, for the continuing purposes of nature conservation and climate actions", which would appear to be a reference to EU LIFE funding (worth about £20 million a year to UK biodiversity conservation). Labour would additionally "establish a horticulture fund, by excluding billionaire landowners from receipt of farm subsidies, to plant more organic fruit orchards sustaining insect and bird life".

Liberal Democrats would establish "funding streams of at least £18 billion over five years" in support of "improving water, air, soil and biodiversity", would "Create a new 'British Overseas Ecosystems Fund' for large-scale environmental restoration projects in the UK Overseas Territories and sovereign bases", would "ensure that the National Wildlife Crime Unit is properly funded" and would "Increase government expenditure on climate and environmental objectives, reaching at least five per cent of the total within five years.".

The Green Party would invest "over £100 billion a year in the Green New Deal", which will include new spending on energy, housing, transport, industry and food, farming and forestry. But very little of this would be directly spent on nature – apparently just £1 billion into research and development for farming & forestry and £0.7 billion on tree and forest planting.

The Brexit Party "supports investment in....the environment" but provides no further detail.

24) Access to environmental justice and democracy

Wildlife cannot speak for itself, it needs to be represented by people and this goes all the way to there being straight-forward access to environmental justice. These principles are enshrined in the Aarhus Convention, the UK is a signatory, but is currently failing to fully apply the laws, so it is currently costly and difficult to ensure that the environment gets proper legal protection.

Labour would "establish an accessible Environmental Tribunal with powers of judicial remedy" to ensure that "administrative decisions are consistent with environmental and nature-recovery obligations" and that "our plans for nature restoration are sustained by our government and by any

others that follow". This could be a powerful benefit if done well, but could be an obstacle if done badly, it also needs to have a clear difference in role from, and a formulated relationship with, the Office for/of Environmental Protection, aspects not explained in Labour's proposals.

The Green Party would "Create a new Environmental Protection Commission (EPC). This will be one integrated body to enforce environmental protections, from clean air to litter-free roads. The EPC will enforce the ecocide law, a new Clean Air Act, which will set new air quality standards for the UK, and a new Sustainable Economy Act, including targets for new soil quality and biodiversity standards." This body appears to be a replacement for the proposed Office for Environmental Protection.

Labour promise they would "lead the campaign for environmental justice on the international stage."

The creation of an international crime of ecocide would give people the opportunity to hold governments and corporations to account for severe damage they may cause to the environment; a new international ecocide law is explicitly supported by Labour and the Green Party.

The Conservatives say they would "ensure that judicial review is available to protect the rights of the individuals against an overbearing state, while ensuring that it is not abused to conduct politics by another means or to create needless delays". There is no reassurance that judicial review would continue to be available to protect the environment, indeed in the last five years <u>legislation</u> has been passed that makes it <u>harder</u> to use judicial review to hold government to account on environmental issues. Dominic Grieve, the former Conservative attorney general has warned that this pledge shows a "clear intent to attack the power to go for judicial review, which would be a very serious matter indeed".

The Brexit Party say that they would "Reform the Supreme Court – judges who play a role in politics must be subject to political scrutiny". This is a frightening proposal, the politicisation of the Supreme Court, as is the norm in jurisdictions such as the USA would make holding government to account on environmental protections much less likely to be successful.

Labour commit to "ensure we meet our international obligations under the Aarhus Convention to ensure participation in environmental decision making", a measure that would improve access to justice and environmental democracy.

There are a number of proposals to improve environmental democracy:

- The Green Party would improve EU democratic accountability by "making positions taken by Member States public" and would appoint a UK "Minister for Future Generations".
- Plaid Cymru would appoint a Senedd "Minister for the Future" to represent the needs of future generations in Wales.
- Labour would require the "Office for Budget Responsibility to incorporate climate and environmental impacts into its forecasts".
- The Lobbying Act 2014 can hamper the ability of the public and charities to speak out on behalf of wildlife Labour would repeal the Act.

Uniquely, the SNP promise to "press the Ministry of Defence to take responsibility for the environmental impact of military munitions as a polluter. There is no such thing as acceptable environmental damage, and no department of government should have an environmental 'get-out-of-jail-free card'". There are international measures currently being debated to make warfare less environmentally destructive, but this may be the first time it has appeared in a UK manifesto?

25) Comparative assessment of manifesto commitments

We have grouped all the relevant components into 44 categories. For each category we have compared the strength of each party's expressed commitments and policies and scored them according to the probability that, if implemented, the measures would contribute to halting the decline and extinction of bees, bugs and biodiversity and restoring sustainable populations to the planet.

It is worth reiterating that as nature conservation is devolved in Wales and Scotland the UK manifestos of parties only standing in those countries are inherently likely to include fewer biodiversity related commitments.

Table 2a. General manifesto commitments from a bee and bug perspective – At a glance table.

Issue\Party	Brexit Party	Conservative	Green	Labour	Liberal Democrat	Plaid Cymru	Scottish National Party
New Environment Act?			*	*	*		*
Office for Environmental Protection?			*	*			
Save Environmental Principles?			*				
Enforceable biodiversity targets?			*	\star	*		
Maintain environmental	\wedge						
protections – post Brexit Environment safe in trade deals?							
Environment sale in trade deals?	\triangle					X	
Global leadership on ecological crisis?				*	*		
Achieve Sustainable							
Development Goals?							

KEY



Wow! - Super policy for bees and biodiversity



Strong policy/good detail/commitments.



Positive mention



Not mentioned - worryingly



Negative mention



Bad policy for bees and biodiversity



Whoa! – Very bad policy for bees and biodiversity

Table 2b. Manifesto commitments directly affecting the room bees and other bugs have to thrive – At a glance table.

Issue\Party	Brexit Party	Conservative	Green	Labour	Liberal Democrat	Plaid Cymru	Scottish National Party
Agri-environment spending for public goods?							
Create wildlife corridors?							
Restore flower rich grassland?							
More trees?				*			
Right trees in the right place?							
Protect and restore bogs and peatlands?			*				\triangle
Restore aquatic habitats?							
Wildlife friendly flood protection?		\wedge					
More rewilding?							
Improve protected site series?				*			
Improved National Parks?				*			
Improved UK marine reserves?			*				
Improved spatial planning system?				*			
Protected brownfield biodiversity?							
Improved protection of species?	\triangle	\triangle	\triangle		\triangle	\triangle	\triangle
Conservation on UK Overseas Territories?							
Global marine Blue Belt?							

Table 2c. Manifesto commitments directly affecting how safe the environment is for bees and other bugs – At a glance table.

Issue\Party	Brexit Party	Conservative	Green	Labour	Liberal Democrat	Plaid Cymru	Scottish National Party
Protected from climate change?			*	*	*		
Safe from pesticides?					, ,		
Organic farming support?							
Less intense light pollution?							
Safer road verges?		*	*	*	*		
Safe from new roads?				٠		•	•
Lowered risk of invasive species?							
Reduced plastic pollution?							

Table 2d. Manifesto commitments directly affecting how friendly our relationship is with bees and other bugs – At a glance table.

Issue\Party	Brexit Party	Conservative	Green	Labour	Liberal Democrat	Plaid Cymru	Scottish National Party
Recognition in manifesto of	_	_			_		
plight of insects and/or bees.							
Education – wider appreciation			4				
of bugs and their roles?							
Access – more contact with							
insects?							
Science – improved							
understanding of their needs?							
Funding for Natural England and		\wedge					
the Environment Agency?							
Funding for biodiversity							
conservation?							
Tackle wildlife crime?							
Corporate responsibility for							
environment in business?							
New Ecocide Law?					, ,		
Improved environmental							
justice?							
Improved environmental							
democracy?							

KEY



Whoa! – Very bad policy for bees and biodiversity