

23rd June 2022

For the attention of:

Lorna Slater, MSP, Minister for Green Skills, Circular Economy and Biodiversity

Re: NGO response to JNCC's report of stakeholder consultation about QQR7

We are writing to express our concerns that have arisen with the recent QQR review and to voice our disappointment in the JNCC's stakeholder consultation report. We have previously written to JNCC and the Statutory Nature Conservation Organisations (letters sent in [June 2021](#) and [January 2022](#)¹) to explain our concerns about the eligibility and decision criteria relating to the listing of species on Schedules 5 and 8 of the Wildlife and Countryside Act 1981, both in the context of the current review and regarding future approaches to protecting species.

Having engaged fully in the consultation, we are disappointed that the recommendations have not been made available and we remain unclear what the final recommendations to government are. We are concerned, in particular, as JNCC's report poorly represented the combined views of the eNGO sector; not least that there was no clear reference made to the strong, united case put forward by the 48 signatories around the shortcomings in the proposed approach to the eligibility and decision criteria. These, as originally outlined, are not fit for purpose either for this review or as the basis for future species scheduling. Limiting the inclusion of species to those on the brink of extinction will ultimately be detrimental to Great Britain's efforts to restore nature and weaken efforts to address the current Biodiversity Crisis. In turn, these would undermine the aims of the Environment Act in England, as well as the Scottish Biodiversity Strategy, the Nature Recovery Action Plan for Wales and the Nature Positive 2030 report.

Effective species protection is an essential component in halting and reversing the decline of biodiversity. We are hopeful that the JNCC's recommendations for this QQR, and the subsequent decisions made around species protection, reflect this. We remain keen to see the development of future approaches to species protection and robust criteria for species selection which will be effective in supporting the Government's ambitions for reversing biodiversity declines, and which will not be constrained by a narrow definition and an inappropriate application of eligibility and selection criteria.

Further background about the concerns can be found [here](#). Please can the minister clarify when a decision is likely to be reached on the JNCC recommendations.

Amphibian and Reptile Conservation Trust (ARC)

Amphibian and Reptile Groups of the UK (ARG UK)

A Rocha UK

Badger Trust

Bat Conservation Trust

¹ Links embedded in the text or available via: <https://www.froglife.org/changes-to-the-wildlife-and-countryside-act-1981/>

Biological Recording in Scotland (BRISC)
Black2Nature
Born Free Foundation
British Dragonfly Society
British Ecological Society
British Hedgehog Preservation Society (BHPS)
British and Irish Association of Zoos and Aquariums (BIAZA)
British Trust for Ornithology
Bumblebee Conservation Trust
Butterfly Conservation
Citizen Zoo
CPRE Kent, the countryside charity
Dumfries and Galloway Pine Marten Group
Freshwater Habitats Trust
Friends of Glasgow's Local Nature Reserves
The Froglife Trust
Glasgow Natural History Society
Hare Preservation Trust
Institute of Fisheries Management
Knepp Estate
The League Against Cruel Sports
The Mammal Society
Marine Conservation Society
Naturewatch Foundation
OneKind
People's Trust for Endangered Species (PTES)
Pesticide Action Network UK (PAN UK)
Rewilding Britain
RSPB
Royal Society for the Prevention of Cruelty to Animals (RSPCA)
Salmon & Trout Conservation

Scottish Badgers

Scottish Wild Land Group (SWLG)

Scottish Wildlife Trust

Trees for Life

Wales Environment Link

Whale and Dolphin Conservation (WDC)

Wild Justice

Wildlife Gardening Forum

The Wildlife Trusts

Wildlife Trusts Wales

The Woodland Trust

The Zoological Society of London (ZSL)