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Registered Office : C/O RECORD, Cedar House, Chester Zoological Gardens,
Caughall Road, Upton, Chester, Cheshire. CH2 1LH
www.alerc.org.uk Forum: <http://forum.lrcs.org.uk>

Defra Draft Biodiversity Monitoring and Surveillance Strategy: ALERC Response

Introduction

ALERC consulted its members on the draft Biodiversity Monitoring and Surveillance Strategy during January and February 2015. A good response was received, and this document provides a summary of the views expressed. The overall analysis has thrown up a number of questions which ALERC believes should be answered in order to provide a better, more comprehensive strategy with greater buy-in from more people.

Summary

Whilst different respondents have picked on a variety of specific areas to make comment, there is a lot of convergence around a few major points, most of which recur throughout the strategy. These points are:

- There needs to be greater clarity in the terms used. Most importantly, ALERC members have been left wondering which sector they are supposed to fit into.
- There needs to be greater clarity on which organisations are expected to fulfil which actions. Important actors such as local authorities and often Local Environmental Records Centres (LERCs) themselves appear very infrequently or have been left out altogether.
- The paradox around Open Data needs to be resolved. The strategy recognises that Open Data can pose a threat to the support LERCs receive from the private sector. However, the strategy aims to cut the level of support from the public purse. How can LERCs therefore support themselves and pursue the Open Data agenda that the strategy advocates?
- The strategy needs to recognise that fact that the Defra bodies acquire much more from their annual agreement with LERCs than data management.
- ALERC should be allowed to provide an official definition of LERCs for this strategy, therefore helping to clarify what LERCs can contribute.

Response in Detail

Section 1 Our strategy

Some people have expressed their pleasure that Defra is to actually have a strategy. However, there is widespread concern that the strategy does not make it clear how it is to be executed, and that there is confusion on the role of individual sectors. For example one item that has been questioned specifically is the need for “providing data about biodiversity to support local delivery and decision making”. Whilst this mentions that data needs to be made to available to local government in general, should it not also make specific reference to the role of DCLG, LGA, individual Local Authorities and LERCs? And on the theme of data being used by local government, what provisions are there to make sure that Local Planning Authorities use the existing data to a greater extent?

On the theme of providing further clarity, the development of “options for a shared data system that allows Defra network site and habitat data to be integrated” has been questioned. Is this referring to the development of the NBN Gateway? If not, what is it? On the theme of the Gateway, future developments must alleviate any bottlenecks regarding data upload and should be aimed at improving the overall upload speed.

The aim to “improve the visibility and access to species ... ensuring that any data collected using public money are freely and openly available” is another area where clarification is needed. What data is this referring to? There is an important distinction to be made between data collected with public money and data where public money has been used to grant access to it. The two are not the same, and this needs to be recognised. ALERC members (in the case of public bodies or those administering the function of a public body) currently grant access to data in accordance with the Environmental Information Regulations.

“Maintain skills and capability for biodiversity monitoring” is not very ambitious. Surely “improve skills” would be better.

It has also been asked whether the list of needs is also missing some measure of access to the natural environment, since this is arguably as important as its conservation.

Section 2 Why have a strategy and action plan?

ALERC members who have commented on this section highlight the fact that the strategy recognises the need for greater use of data to assess national progress towards targets as well as local management. Therefore, should existing local wildlife sites information not be used to achieve both of these? Is there an opportunity to involve volunteers in local surveillance schemes? Opinion is divided on how possible it is to direct volunteers in this way, and any further development of volunteer surveillance strategies will need to be supported financially.

Section 3 Biodiversity change and natural capital

There were a couple of remarks on this section. Where reference is made to “collaboration between government, research and voluntary sectors” it is important to clarify where LERCs fit in. They should not be seen as representatives of the volunteer community (as might the National Forum for Biological Recording).

An important consideration is that where the strategy suggests changes are to be made to “the way we collect, manage and analyse data on sites, habitats and species” these need to be communicated to LERCs and other partners to achieve cross sectorial standardisation.

Section 4 Sites and habitats

ALERC members have raised a number of areas for clarification here. What is meant by making data more available for local decision making? Is this between the Defra bodies, or with organisations such as local authorities, or via LERCs or a combination of the three? What about other data collected through public sector work such as protected site monitoring? Is this to be made openly available?

Again, clarification is required on the use of terms. In this case, NGOs are referred to, but does this include LERCs? If so, it shouldn't as some are within local authorities.

The strategy outlines what is spent by the Defra Network on habitat and protected site monitoring. However, other organisations (such as LAs and LERCs) are also investing in this, which should be recognised. The gross value could be calculated on request. Data from Local Wildlife Sites surveys is made available to the Defra bodies. Also, where LERCs are already working well in partnerships that align survey effort and use Earth Observation data, this should be acknowledged and used as examples of best practice.

There is concern towards the notion of savings as this may be a false economy. For example, could the overall benefits (including health) of encouraging and enabling the public to undertake voluntary recording, outweigh the costs? How much is being invested in Earth Observation as compared to traditional methods of reordering? EO should justify the resources spent on it as much as any of the other sectors and systems outlined in the strategy.

Also, how can a reduction in spending by local authorities on site monitoring be mitigated? Species and habitat data generated from local wildlife site monitoring will become reduced as LAs reduce the amount they spend on LWS monitoring.

Section 5 Species

Specific reference to pollinators is welcomed, but are there other areas of natural capital that could also be specified?

Again there is the problem of referring to data being made available to local decision makers. Whilst the notion is fine, what data and which decision makers needs to be specified.

Section 6 Data management and sharing

This section has received the most comments by far.

As in earlier sections, clarification on the role of different players across the sector is required. For example in the statement “we cannot assess species and habitat outcomes, to inform national local decision-making, without accessible, standardised biodiversity data” who is “we”? Later on, the same criticism applies. Where the strategy says that the NBN partnership will be supported and that it will include “government agencies, volunteer organisations and the scientific community” where is it expected that LERCs (and for that matter National Schemes and Societies) will fit in, if anywhere? Where LERCs are specifically referred to, there is then a proceeding mention of “Local Data Centres”. If these are different from LERCs, then this needs to be stated, if not then there needs to be consistency on the term to be used.

This is the first section of the document that attempts to outline a policy towards Open Data in any kind of detail. However, it is not enough detail. Considering Open Data appears to be quite an ambitious objective, there are several questions that need answering before it can be tackled. The first one is why does data need to be open? There are comments throughout the document about improving accessibility to data for decision makers, but nowhere is the case for openness set out in detail, nor are its downsides really discussed. What if the move towards openness actually reduces the number of records available, either by damaging the organisations who mobilise it, or because volunteer recorders do not wish to see their data openly available? In what way is it expected that this will encourage local authorities to engage with LERCs? Would Defra be happy to see fewer records available if it meant they were openly available? What is the Open Data position as regards records of sensitive species?

It is welcomed that the strategy acknowledges the threat that a free and open data agenda poses to LERCs (and others) and that in the short term fully open access will not be asked for. However, the long term ambitions of the strategy are not clear and there are several unanswered questions e.g. how will offering a range of data services from the NBN Gateway cover the loss of income from the private sector? The whole tone of the strategy is unsurprisingly one of cost cutting and reducing investment from the public sectors. Therefore, is it not wise to try and grow the amount of investment from the private sector, rather than to stifle it? Is it the view of Defra that the overall capacity of LERCs should be allowed to decline, and if so, how is it imagined that their role in validation, verification, training and advocacy be replaced?

There is an aspiration to increase data flow. Would the relevant government departments and agencies therefore be willing to insist that all biodiversity data acquired through the planning process be shared?

The figure of £700 000 presented as the total amount spent by Defra on LERCs is noted by ALERC respondents, but not challenged. What is challenged is why a similar figure is not presented for say NSSs or the NBNT. Where was the remaining £600 000 of the data management budget spent and why is this not stated? It is thought that in many cases the money offered by the Defra bodies to LERCs does not cover the amount of time it takes to do the work asked for (especially in the case of NE and especially when considering a significant proportion of the money goes straight back to the Treasury in terms of VAT).

Also, there is a specific mention of “data management cost”. What constitutes a data management cost, and what part of the current data management process needs to be foregone in order to reduce this cost? ALERC members feel that data management costs should be shared by all those who need to use the data they are able to provide. The strategy suggests that tools like online recording will reduce the costs of data management, but this requires further explanation. LERCs have a lot of combined experience of working with online recording and can help with this. Finally on this point, it is very important that the strategy acknowledges the fact that the Defra bodies receive far more than just data management from LERCs. This can be demonstrated by the delivery profile of the last few years’ MoAs.

Section 7 Skills and capability

There is little comment on this section, except to reiterate the need to be clear on who is expected to execute each action. Could ALERC be considered as a key partner for all of the actions, especially considering the fact that LERCs commit much of their time to training, improving skills and improving verification capacity?

No specific comments other than to query “voluntary sectors” and where LERCs fit in. A clarification of the roles of sectors should remedy this.

Annex 1 Strategy development

No specific comments.

Annex 2 Glossary of terms and organisations

The definitions in the glossary are strongly challenged. The definition of the NBN seems inadequate. For example, should it not include NGOs and private members? The wording does admit that the definition is not a tight one, but since the strategy relies heavily on the NBN in areas, would it not be sensible to draft a tight definition of what the NBN actually is? Should the NBNT not be approached to do this itself?

The definition of LERCs is similarly inadequate. In the main, it does not recognise the actual work that LERCs do in order to enable data to be shared. Much of this work is actually required for the strategy to function (such as working with expert verifiers, training – including in online recording – and advocating the need for data sharing). It is likely that ALERC will very shortly wish the official term for records centres to be “Local Environmental Records Centres”. At the same time, it will finalise its own definition of what LERCs actually are. Would it not there for be wise to allow ALERC to submit the definition of LERCs for this part of the document? ALERC can also calculate an accurate average proportion of their support that comes from the various sectors if required.

Annex 3 Joint statement on Defra network engagement with the National Biodiversity Network

No specific comments

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