Introduction

1. UK Overseas Territories Conservation Forum (UKOTCF) is a UK-based non-government charity, which brings together and supports the work of NGO and governmental conservation organisations in the UK Overseas Territories (UKOTs) and Crown Dependencies (CDs). It is the only organisation dedicated solely to conservation and sustainable use across all UKOTs and CDs. In addition to providing wider support to local bodies in conserving their fragile but biologically diverse ecosystems and the services they provide, it aims to ensure that UKOTs and CDs are not overlooked in discussions in the UK (in Government, Parliament and more widely) which affect them, especially those concerning the protection and promotion of their unique, economically important, but fragile environments. It therefore provides this submission to ensure engagement of UK government departments in good governance and protection of citizens’ rights in its UKOTs does so in a way with recognises its globally important biodiversity and ecosystems services.

2. HMG has international responsibilities for UKOTs and CDs. Good governance by the UK of its Overseas Territories requires political and administrative structures that promote healthy social, environmental and economic outcomes for the territories. However, all the permanently inhabited territories have their own social, economic and political institutions. This inquiry by the FAC will naturally matter to those who live in the territories, even though, as non-UK residents (but mainly UK citizens), they do not have opportunities to vote in UK elections. However, this inquiry is taking place during the final months before ‘Brexit’. With so much uncertainty about how that unfolds and the consequences for all parts of the UK as well as the UKOTs and CDs, it would be unrealistic to expect an inquiry to be able to gather sufficient evidence to make detailed recommendations of fundamental structural changes in the relationships between the UK and its OTs. However, we try to identify some recommendations and evidence, which has been gathered, in part from the statement made at the recent meeting of Environment Ministers Council of the UKOTs and CDs, which took place in February 2018, and our on-going interest and involvement with the UKOTs.

3. In this memorandum, UKOTCF makes the following main points or recommendations, the background and rationale for which are given in detail below:

   a) We recommend that UK Government assists in resourcing UKOTs to fulfil environmental convention reporting requirements and press for these to be scaled appropriately for UKOTs (para 6).

   b) We recommend that UK Government use UKOTCF’s review of progress towards Environment Charter commitments and Aichi Targets, even if simply to assess what further information remains to be collated. UKOTCF recommend also that UK Government fund future studies of this sort at regular intervals, in order to maintain an updated picture of UKOTs/CDs conservation progress including, but not limited to, the marine environment (para 11).

   c) We recommend that UK Government seeks to increase collaboration with, and support of, NGOs active in UKOT conservation, to facilitate their highly cost-effective work and long experience of working with UKOT partners (para 12).

   d) We recommend that UK Government fulfils requests from HM Government of Gibraltar in addressing infringements from Spain in British Gibraltar Territorial
Waters, as well as facilitating Gibraltar’s request to join international environmental agreements, including – but not limited to – the International Commission for the Conservation of Atlantic Tunas and the Barcelona Convention for the Protection of the Mediterranean Sea Against Pollution (para 22).

e) We recommend that UK Government addresses the recommendation of the UKOT/CD Environment Ministers Council and discusses with them a better approach to granting decisions, involving UKOTs as well as more persons with wide experience of operating UKOT conservation projects (para 27).

f) We recommend that an additional fund of at least the same value to previous EU funding be made available by UK Government to those undertaking conservation work in the UKOTs (para 28).

g) We recommend that DFID now commits to funding the remaining one third of Pitcairn’s renewable energy installation, as also recommended by the UK Overseas Territories Environment Ministers Council in 2017 and 2018 (para 29).

h) We recommend that UK Government increases its funding for terrestrial conservation in the UKOTs so that threats to endemic and other restricted species and ecosystems can be addressed (para 31).

i) We recommend that DFID takes steps to bring its advisers up to date on the central nature of environmental aspects in international transitional funding (para 32).

j) We recommend that FAC reiterates its previous recommendation that FCO should strongly encourage all Overseas Territories which have not yet done so to introduce freedom of information legislation (para 35).

k) We recommend that the capacity of NGOs to deploy their skilled volunteer capacity and huge cost-effectiveness be restored by UK Government returning to the situation whereby its own agencies do not apply for the limited grant funds available for conservation in the UKOTs (para 39).

Governance of the OTs

4. UK and UKOT governments agreed a partnership approach to integrating environmental aspects into all sectors via their Environment Charters, signed in 2001 or, in one case, approved separately. The Environment Charters arise from the 1999 White Paper in which the UK Government outlined its expectations for good governance in the Overseas Territories by encouraging these measures, which are needed for the preservation of the environment, the promotion of high standards of financial accountability, respect for human rights and compliance with the rule of law.

5. HMG is a signatory of the Convention on Biological Diversity (CBD) and several other conventions that protect marine, migratory and endangered species. It has a commitment to meet international obligations to protect its globally biodiversity in the UKOTs. Whilst HMG does not include in CBD (or other Conventions) UKOTs, which are unable to meet obligations, it still has a responsibility under CBD to assist the UKOTs who are not included to protect this biodiversity.

6. The decisions as to whether or not a territory is included in UK’s ratification is a matter for the territory concerned, and that, if UK is asked by a territory government to include it, or not include it, in a convention, that request should be fulfilled. We believe that the level of administration and reporting for a territory to meet convention requirements should be scaled

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to that territory’s size and not necessarily to the scale of Britain itself. Smaller UKOTs and CDs face difficulty in developing and enforcing appropriate environmental policies as they typically have few civil service resources of their own. They also have little access to external resources. **We recommend that UK Government assists in resourcing UKOTs to fulfil environmental convention reporting requirements and press for these to be scaled appropriately for UKOTs.**

7. Since the 2012 White Paper was published, events, which have taken place have had an impact on the FCO’s key priorities. These include, most notably: Hurricanes Irma and Maria which impacted several Caribbean UKOTs; the Panama Papers increasing pressure on the financial services industry; and the referendum result, which will see the UK leave the European Union and the financial and technical resources that benefit UKOTs currently. It is evident that the loads placed on UK officials, as well as the huge number of staff changes, in relation to preparations for ‘Brexit’ have reduced the attention they could give to UKOT matters.

8. Originally following closely the core principles of the Rio Declaration 1992 and as a result of the 1999 White Paper, the Environment Charters, signed in 2001, are as relevant today as they ever were. We, and the Environmental Audit Committee were somewhat concerned that the 2012 White Paper, whilst making clear that it reinforced the 1999 White Paper, made no reference to the Environment Charters, which were a main consequence of the 1999 paper. We are pleased that UK Government, with the UKOT governments, has since confirmed the continuing relevance and importance of the Charters.

9. The A review, collated by UKOTCF in 2016, gathered information from UKOTs/CDs on progress towards implementing the Environment Charters signed by territories and UK Government (or equivalents for territories without Charters). Simultaneously, an assessment was made of progress towards Aichi Targets, internationally agreed in 2010 by Parties to CBD and other Conventions. Late in the process of data-collating, UN Sustainability Goals (SDGs) were adopted and these also were linked into the process. The review was adopted by the 2nd UKOT/CD Environment Ministers Council meeting in April 2017.

10. Many aspects of the Environment-Charter Commitments, Aichi-Targets and SDGs relate to protection of the environment, e.g. Aichi Target 11: “By 2020, at least … 10 per cent of coastal and marine areas … are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas”. Data collated through UKOTCF’s review therefore created an overview of the current situation in each territory’s environment.

11. As an example, UKOTCF’s report identified a need to “extend the protected area network (both terrestrial and marine) basing where possible on scientific evidence and local

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3. The Overseas Territories: Security, Success and Sustainability

4. [Chapter 1 Defence, Security and Safety of the Territories and their People; Chapter 2 Successful and Resilient Economies; Chapter 3 Cherishing the Environment; Chapter 4 Making Government Work Better; Chapter 5 Vibrant and Flourishing Communities; Chapter 6 Productive Links with the Wider World](http://www.unesco.org/education/pdf/RIO_E.PDF)

5. Barnsley, S; Cary E; Pienkowski, P; Wensink, C (2016) Review of performance by 2016 of UK Overseas Territories and Crown Dependencies in implementing the 2001 Environment Charters or their equivalents and moving towards the Aichi Targets and Sustainable Development Targets. UKOTCF
   [https://www.ukotcf.org.uk/implementation](https://www.ukotcf.org.uk/implementation)
consultations” and to “strengthen protection”, in 17 of the 21 UKOTs/CDs. Also, needs were identified specific to each Territory, such as to “monitor fish overspill from MPAs” in Cayman. **We recommend that UK Government use UKOTCF’s review of progress towards Environment Charter commitments and Aichi Targets, even if simply to assess what further information remains to be collated. UKOTCF recommend also that UK Government fund future studies of this sort at regular intervals, in order to maintain an updated picture of UKOTs/CDs conservation progress including, but not limited to, the marine environment.**

12. We believe that the role of the FCO remains an important one, particularly in the good governance of the UKOTs, provision of technical and financial assistance, engaging with other HMG Departments and in its facilitation in ensuring UKOTs interests are recognised in the UK and internationally. However, shortly before the FAC’s previous report on this topic, FCO drastically cut its environmental staffing for UKOT matters. This appeared to have been done in expectation that DEFRA would assume responsibility for this aspect. However, it seems that resources were not transferred, and the number of DEFRA personnel allocated to coordination of key aspects in the overseas territories is extremely small, even once this was started after several years of delay. Also prior to FAC’s 2007 report, DFID had engaged constructively in environmental conservation in UKOTs, but subsequently reversed this position. This included removing initially half the post, and then the whole post of the officer concerned with the environment in UKOTs, and disengaging itself from engagement with the UKOT conservation bodies including UKOTCF, with which it had previously dealt. The situation was not helped in that, following the start of establishment of good communications between NGOs, FCO, DFID and DEFRA on UKOTs, in 2010, DFID moved its OT Department 400 miles away from the offices of the others, leading to total personnel change, effective loss of coordination, and the loss of interest by DFID in UKOT environmental conservation. The stresses on DEFRA and FCO staff have also led to reduced communications with some NGOs and some UKOTs. An attempt to increase liaison in this area in bodies based in UK failed largely because UK Government departments did not generally participate, instead delegating to one of their agencies, which was not authorised to address the policy matters which were the subject of the meetings. **We recommend that UK Government seek to increase collaboration with, and support of, NGOs active in UKOT conservation, to facilitate their highly cost-effective work and long experience of working with UKOT partners.**

13. HMG and FCO have an obligation to ensure that principles as set out in the Environment Charters are upheld, including those relating to good governance. They remain important to many UKOTs.

14. Environmental Impact Assessment (EIA) are considered fundamental to good planning practices in the UK. However, many UKOTs still need to review and update quite urgently their environmental legislation, institutional capacity and mechanisms to further this. Can HMG provide technical assistance to move this forward? The Environment Audit Committee (EAC) have made recommendations that FCO assistance in ensuring planning process is effective and takes into account environmental considerations.7 UKOTCF has, at the request

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7 “The FCO cannot abnegate its constitutional responsibility to ensure that good governance arrangements are introduced in the UKOTs. Sustainable development in the UKOTs is contingent on their Governments implementing effective development controls, such as statutory environmental impact assessments for major developments and strategic infrastructure plans. Defra must work with UKOTs Governments on developing planning regimes which value and protect natural capital and which promote sustainable tourism industries and economies. Accordingly, the FCO must direct its Governors strongly to advocate the introduction of effective development controls. In particular, the Governors in Anguilla...”
of FCO and despite the funding which FCO had offered to defray costs failing to be supplied, provided *pro bono* advice and training to certain UKOTs on this matter – but our resources are very limited.

15. The importance of EIAs and the Environment Charters is laid out in detail in two Special Reports of the Bermuda Ombudsman⁸, as part of her assessment of Bermuda’s obligations to implement its Charter commitments specifically in relation to environmental impact assessments. HMG had an opportunity to show good diplomacy when this issue arose, but it chose to take the line that the Environment Charters were ‘aspirational’ and that they had no legal basis. The Bermuda Supreme Court agreed with the Ombudsman that the Charters are binding, and UKOTCF strongly endorses her position and the decision by the court.

16. There are some examples of poor governance showed by UK Government itself while in direct control of the Turks and Caicos Islands (TCI). The direct rule was an eventual result of one of the recommendations from the FAC’s 2007 inquiry. This was supported by most Turks and Caicos Islanders and, indeed, by UKOTCF as the correct thing to do in the circumstances. However, UK government’s implementation of this was not good. HMG put enormous pressure on their governors to balance the bottom-line – even to the extent of abandoning their previous advice to the governments of TCI and other overseas territories of giving due weighting to the environmental and sustainability aspects for the longer term future. This led, under direct rule, to an abandonment of many of the constraints on physical development and, quite shockingly, Governor Todd reversing the existing laws previously banning the keeping of sea mammals in captivity, now to allow the possibility of dolphinaria. This was done without consulting local statutory advisors on the environment. HMG’s record in direct rule is not good and led to much environmental setback, with the danger of setting bad precedents for the future for overseas territories, now including TCI, in local governance. Whilst it was important (and generally welcomed) that UK Government took control, its obsession with short-term financial points, and its abandoning of its previous positive position on environmental conservation and other areas did immense (and continuing) environmental damage, including the abandonment of a popular conservation tax on visiting tourist to support conservation and environment management measures, and probably to human rights too.

17. There are other cases in which, whilst not in direct control, UK Government was effectively in control of financial decisions. At the time of the initiation of the St Helena airport, conservation bodies locally and the UK, including ourselves, agreed not to oppose this initiative. Although we would certainly have done so in any other location of such high global biodiversity importance, we recognised also that conservation needs St Helena to have a viable human population. We were assured that this required an airport and that there was only one possible location. For this, our lack of opposition was conditional on the airport and its construction having the smallest possible “footprint”. We are concerned that, as we now know, DFID acted against the advice of its consultants and unilaterally cancelled pre-construction testing flights to examine the problem of wind-shear, resulting in an airport far less suitable than planned. This has resulted in a misplaced runway and the need for subsequent modifications – which clearly indicate that the footprint was not minimised. DFID exacerbated the situation by refusing to reveal – even to St Helena elected councillors

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– the terms of reference of the supposedly independent consultant that DFID had committed to Parliament to engage to examine the situation – and DFID would not even reveal the name of the independent consultant. This is not open government.

18. Ascension Island Government developed a tourism strategy to complement that of St Helena in the run up to the opening of the Airport, including the hiring of a full-time Tourism member of staff. However, the airport on Ascension has been closed to most aircraft for 4 years until runway repairs are scheduled. This has led to the closure of the only hotel on the island and at least two other businesses because of the decision by Government not give a tax-break to them for the 4 years while they have no income. This may also have consequences for the environmental management of this important island, as well as much uncertainty for those that have invested time and money into the island. FAC have previously reported: “We conclude that the FCO did raise expectations that rights of property and abode would be granted to those who live and work on Ascension Island. We recommend that the FCO must make greater efforts to restore trust among the residents of the Island. In particular, we recommend that it should try to re-establish the Island Council as soon as possible. We further recommend that the FCO should work with elected representatives to consider the potential contingent liabilities of a permanent base on Ascension Island, and means of reducing these liabilities, with the ultimate aim of granting rights of property and abode to residents.”

Benefits to the UK and the OTs of the relationship between them

19. The benefits of the relationship between the UK and the UKOTs are often intangible. Today, there are, at any one time, a large number of UKOT personnel residing in the Britain. This diaspora includes generations of families living and working in many clusters in Britain with these close family ties. For a few UKOTs, more personnel may be in UK than in their home island, for various reasons often outside their control.

20. UKOT students studying in the UK (naturally, we have an interest in those studying natural sciences, but those studying other subjects) in most cases will have a view of returning to their UKOTs to offer skills and qualifications. Many have benefited from the EU Erasmus scheme, as have many UKOTs in terms of work experience placements, which lead to introductions to new cultures, ideas and expanded horizons.

21. The UK has an opportunity to be proud of its global diversity existing in the UKOTs and should cherish this relationship. It has a strong presence on a global stage when it comes to global issues and is able to use their geographic spread to contribute to research, global issues, global biodiversity importance etc.

22. When the UK leaves the European Union, Gibraltar will lose the only effective technique it has – via EU regulations and procedures – of moderating the environmentally damaging activities of Spain. UK Government should provide additional support to HM Government of Gibraltar, should it be requested. In 2014, HMGOG adopted science-based Marine Protection Regulations. To enforce these, support from UK is needed because of incursions by Spanish fishermen, Spain not recognising British Gibraltar Territorial Waters (BGTW). During designation of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) under EU Directives, it was a requirement for Gibraltar’s designations to be passed via HMG. Unfortunately, it took so long in sending these that Spain designated overlapping areas as SACs/SPAs, including in BGTW. HMG then missed the deadline for objecting to this
situation, meaning that the EU accepts both the Spanish and the later UK/Gibraltar designations (until the latter no longer apply if the UK leaves the EU). \textit{We recommend that UK Government fulfils requests from HM Government of Gibraltar in addressing infringements from Spain in British Gibraltar Territorial Waters, as well as facilitating Gibraltar’s request to join international environmental agreements, including – but not limited to – the International Commission for the Conservation of Atlantic Tunas and the Barcelona Convention for the Protection of the Mediterranean Sea Against Pollution.}

23. ‘Brexit’ is likely to have extremely detrimental effects on the economy of many UKOTs, which will impact the environment negatively, especially via the marketability of sustainably produced foods, because these depend on UK’s membership of the EU. A report commissioned by the UK Overseas Territories Association (UKOTA) published in June 2016, outlined some of the technical advice and financial support given to the UKOTs.\footnote{9 The United Kingdom Overseas Territories and the European Union: Benefits and Prospects Part I – EU Benefits to the United Kingdom Overseas Territories. A report produced for the United Kingdom Overseas Territories Association (2016) \url{http://ukota.org/manage/wp-content/uploads/UKOTA-Final-Report-on-Benefits-of-EU-to-UKOTs.pdf}}

24. Lack of legal draftspersons is still an impediment to progress in implementing new legislation in the UKOTs. This was recognised by the FAC in 2007 (\textit{“We also recommend that the FCO should provide more drafting assistance to Overseas Territories for transposition of international agreements into local legislation.”}). International NGO partners in projects with some UKOTs have recognised this barrier and have sought to overcome it by bringing in legal draftspersons during the consultation phase. It is not unreasonable for this kind of support to be supplied by UK Government to the UKOTs. This makes it almost impossible for new environmental legislation to be passed when there are so many other competing demands.

25. Since 2015, UKOT & CD Environment Ministers have met, with the intention of this being approximately annual. The Joint Ministerial Council has welcomed this Environment Ministers Council. Most recently, this was held in the Isle of Man in 2018 with the others in Gibraltar in 2015, and Alderney in 2017. At the Ministers’ request, UKOTCF provides the secretariat for these meetings. The territory environment leaders invited UK Government Ministers for the second day of the meeting in order to discuss directly with the latter a range of topics relating to the precious environments and to share the ambition to protect them for future generations. The UKOT and CD ministers were pleased to welcome the presence of senior officers from FCO, DEFRA and the Department for Business, Energy & Industrial Strategy (BEIS), representing their ministers, and for a discussion by remote technology in one session with Dr Thérèse Coffey MP, Parliamentary Under Secretary of State for the Environment and Rural Life Opportunities, DEFRA. This positive engagement in the third meeting by UK Government was highly appreciated and gave an opportunity to raise some concerns with regards to environmental matters.

**Financing of the OTs**

26. The previous FAC inquiry (HC 147-I, published 6 July 2008) and several EAC inquiries have all concluded “\textit{that the Government does not appear to have carried out any kind of strategic assessment of Overseas Territories’ funding requirements for conservation and ecosystem management.}” FAC’s previous conclusion went further that: “\textit{given the vulnerability of Overseas Territories’ species and ecosystems, this lack of action by the Government is highly negligent. The environmental funding currently being provided by the}
UK to the Overseas Territories appears grossly inadequate and we recommend that it should be increased. While DEFRA is the lead Whitehall department responsible for environmental issues, the FCO cannot abdicate responsibility for setting levels of funding given its knowledge of Overseas Territories’ capacity and resources. The FCO must work with other government departments to press for a proper assessment of current needs and the level of the current funding gap and then ensure increased funding by the Government through DEFRA, DFID or other government departments is targeted appropriately.” (Paragraphs 27 & 295)

27. Since FAC’s previous report, two separate sources of modest UK Government funding (FCO/DFID Overseas Territories Environment Programme and part of DEFRA’s Darwin Initiative) have been merged into one fund, Darwin Plus. This was done without consultation and has effectively narrowed the range of opportunities and reduced the involvement in decision-making as to funding of those experienced in actually undertaking this sort of work. Increasingly also, available funds are being allocated to UK Government’s own agencies (which did not apply for funding to some predecessor funds), with reductions in funding to NGOs – which can give very high value for money because of major donated resources which funding can release. The UKOT Environment Ministers Council has expressed concern about these aspects. We recommend that UK Government addresses the recommendation of the UKOT/CD Environment Ministers Council and discusses with them a better approach to granting decisions, involving UKOTs as well as more persons with wide experience of operating UKOT conservation projects.

28. It is unfortunate that the fund set up by the European Commission Biodiversity and Ecosystem Services in Territories of the EU Outermost Regions and Overseas Countries and Territories (BEST), after many years of lobbying by UKOTCF and others including French and Dutch equivalent bodies, is unlikely to be available to UKOTs after UK leaves the EU. This is despite the efforts of those in the UKOTs involved in developing this pilot fund, which included the publishing of a series of ecosystem profiles and the design and implementation of several on-the-ground projects to benefit biodiversity. We recommend that an additional fund of at least the same value to previous EU funding be made available by UK Government to those undertaking conservation work in the UKOTs.

29. We are concerned also that the apparent reluctance by DFID to support non-fossil-fuel energy generation on Pitcairn. At present, not only does Pitcairn depend on fuel oil but this must be shipped from New Zealand across most of the Pacific to reach Pitcairn. At the request of Pitcairn, as long ago as 2010, UKOTCF helped the island develop an initial proposal to explore renewable energy sources. However, DFID could not be persuaded to support this for many years. Eventually, the European Union agreed to support initially exploration of feasibility, and then to meet two-thirds of the cost. We recommend that DFID now commit to funding the remaining one third of Pitcairn’s renewable energy installation, as also recommended by the UK Overseas Territories Environment Ministers Council in 2017 and 2018.

30. Marine management is being supported in several UKOTs, through the Blue Belt programme, whereby 4 million km² of ocean around oceanic UKOTs will be given long term protection by 2020 – this gives HMG an opportunity to lead the world in marine protection led currently by CEFAS. The programme provides £20 million of funding over 4 years (2016-2020). It is initially focused on seven islands and archipelagos: British Indian Ocean Territory, South Georgia and the South Sandwich Islands, British Antarctic Territory,
Pitcairn, St Helena, Ascension Island and Tristan da Cunha. It will be important to include those UKOTs with larger populations to help them also manage their already established marine protected areas (see written and oral evidence supplied to EAC inquiry on MPAs revisited\textsuperscript{10}). These are more complex situations, with existing local fisheries and bordering waters of other nearby countries, but where resources to manage EEZs are limited despite the hard work of many dedicated bodies locally who strive to protect the marine environment. As with the current work, we cannot stress enough how important it will be to work with all sectors of society in achieving these aims and that proper credit is given to them by HMG in communicating its progress. In those UKOTs already managing their waters with regulations and active enforcement, HMG have a role in highlighting these cases.

31. We welcome the work that FCO has done in accessing much needed resources for the UKOTs via its BlueBelt. However, this appears to squeeze funding on conservation terrestrial ecosystems, where most known endemism exists. Furthermore, this squeeze could be exacerbated if the marine funding is in doubt if the National Audit Office’s finding that the FCO has not been transparent in administering of the CSSF funds has an impact. \textit{We recommend that UK Government increases its funding for terrestrial conservation in the UKOTs so that threats to endemic and other restricted species and ecosystems can be addressed.}

32. DFID seems also not to understand current trends in transformational investment. The World Bank and the non-governmental investment banks coming together in the International Finance Corporation (IFC) have increasingly required strong environmental safeguards on their financing support. However, when two senior advisers to these bodies happened to be present (providing \textit{pro bono} support to other work on Montserrat) during the initial presentation by DFID to their annual budget visit to Montserrat in late 2016, they were shocked that this made no mention whatsoever of environmental matters. Not only is this bad for the environment, but it is also minimising the chance of Montserrat (and presumably other UK overseas territories) securing transitional investment in such sources. This is at odds with DFID’s Overseas Territories policy, which aims to attract investment and stimulate private sector-led growth in the aid-dependent Overseas Territories, while still providing direct support. The Independent Commission for Aid Impact has previously shared the view that Montserrat is not being served well by DFID. It is a matter of great concern that the advice being given by DFID to at least some UKOTs about attracting transitional investment seems to be decades out of date, by making no mention of environmental factors which most international investors now insist on being central. \textit{We recommend that DFID takes steps to bring its advisers up to date on the central nature of environmental aspects in international transitional funding.}

\textbf{Representation of the OTs in the UK and in the Commonwealth and other international fora}

33. We share the view of UKOT/CD Environment Ministers Council that UKOTs should participate in CoPs/MoPs and help formulate the UK negotiating position for treaties potentially or actually extended to them. The HMG approach was positive in 1990s/2000s but became negative in 2010s. The recent meetings of the UKOT/CD Environment Ministers Council resulted in an invitation to a representative of a representative of UKOTs to the

\textsuperscript{10} [link to evidence document](http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/environmental-audit-committee/marine-protection-areas-revisited/written/39815.pdf)
forthcoming Climate Change meeting in Dubai. There are some indications of such a return to a positive approach, and this should become standard practice.

34. We welcome HMG’s invitation for UKOTs to participate in the most recent Commonwealth Heads of Government Meeting in London 2018, but we believe that Ministers and Governors should be fully briefed on UKOT matters, as recent statements by top UK ministers that UKOTs are members of the Commonwealth, rather than via UK, is embarrassing and does not bode well for cooperation between partners.

35. FAC’s 2007 Inquiry recommended that the FCO should strongly encourage all Overseas Territories, which have not yet done so to introduce freedom of information legislation. However, the only signs of this appear to be discouragement. *We recommend that FAC reiterates its previous recommendation that FCO should strongly encourage all Overseas Territories which have not yet done so to introduce freedom of information legislation.*

**Assets and liabilities (including but not limited to ecological richness and the effects of extreme weather, and natural resources such as minerals and fish).**

36. The UKOTs boast some of the world’s most delicate and complex ecosystems and habitats. Collectively they hold a truly staggering amount of biodiversity, which provides them with many goods and services, e.g. fishing, tourism, storm protection, renewable energy supply. In terms of endemic species, proportions of other species supported, sensitive ecosystems and threatened species they hold even greater importance than that of metropolitan Britain. In fact, an estimated 94% of the biodiversity for which UK is internationally responsible is in the UKOTs, rather than Britain and Northern Ireland – but UK Government spends several orders of magnitude less per endemic species in UKOTs than in Britain. This biodiversity has served to underpin sustainable livelihoods the inhabited UKOTs for many generations. This biodiversity provides also the potential to underpin continued and raised living standards and employment in such areas, especially through, for example, sustainable tourism. These natural assets need both safeguarding and management, in order to support the features that provide the attractions on which sustainable tourism can be based, and which also maintain the quality of life and culture of local communities.

37. About 90 endemic species (i.e. those which occur nowhere else) occur in mainland Britain, compared with 3300 known so far in the UKOTs. We say ‘so far’ because there are still great unknowns and gaps resulting from understudied taxa such as invertebrates, which could be filled if sufficient funding and expertise were made available. About 75% of those formally reviewed are globally threatened, and most of those not yet reviewed are likely to be similarly threatened. By including the territories, the United Kingdom's exclusive economic zone (EEZ) is the fifth largest in the world, at 6,805,586 km². The total reef area inside the UKOTs mapped by the Millennium Mapping Project is 4,712 km², making the UK the twelfth largest reef nation of the World¹¹. UKOTs support more penguins than any other nation on earth, holding an estimated 36% of the world’s population of southern rockhopper penguins and 34% of gentoo penguins¹², as well as several other species. Terrestrial ecosystems include some of the rarest habitat types on the planet. Many are particularly biodiverse, including Montserrat’s Centre and Soufriere Hills, and Diana’s Peak on St Helena, which holds at least 119 endemic invertebrate species.

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¹¹ Sheppard, C (Ed.) (2013) Coral Reefs of The United Kingdom Overseas Territories

38. Making available to local users (and others) the scattered available biodiversity data is important. HMG has recognised this and has started some work on metadata catalogues through Defra’s agency, the Joint Nature Conservation Committee (JNCC) with other partners. One example of recently work is that of UKOTCF, Montana State University and Montserrat National Trust, with UK Government part-support, to pioneer this, by the formation of the online Montserrat Virtual Museum of Natural History. This has started by collating and digitising beetle records but, with modest resourcing to enable donated expertise, could be expanded to other taxa and other UKOTs.

39. As mentioned, the recent increase in funding for oceanic marine conservation is welcome, but this money has gone to UK Government’s own agencies, not to the NGOs and UKOT conservation bodies which have been struggling for years to conserve these assets. In addition, UK Government agencies did not previously apply for the UK Government grant funds for UKOT conservation (EFOT, OTEP, now Darwin Plus), but now do so and indeed receive significant funding from it. This squeezes out NGOs – which tend to multiply the funds by pulling in in-kind and other additional support – but cannot do so without basic grant support. Thus overall cost-effectiveness is being reduced by this change in UK Government practice. There are also questions of conflict of interest when UK government bodies are both the decision-maker and applicants competing with others. **We recommend that the capacity of NGOs to deploy their skilled volunteer capacity and huge cost-effectiveness be restored by UK Government returning to the situation whereby its own agencies do not apply for the limited grant funds available for conservation in the UKOTs.**

40. The expected support post-hurricanes of 2017 was well done by UK forces, but serious questions have been raised by those in the territories about the flexibility of prior resourcing of those assets, and by the limitations on follow-up support. This applies both generally and to the environment. Of particular concern are the UKOT environmental NGOs, which both safeguard some protected areas and depend on visitor fees for core income. With the infrastructure of both the protected areas and elsewhere damaged, how will these bodies maintain their existence and work? With extreme weather events expected to become a new norm, resilience and disaster management is critical to the safety, security and well-being of the UKOTs and the UK has a major responsibility to ensure that efforts focus on preparedness in the long-term with heavy investment.

41. It is also a major source of concern that Montserrat still lacks a breakwater (and other infrastructure) more than 20 years after the volcano put its previous one out of action. Both this and the long series of contradictory consultants’ reports (usually with minimal local input) commissioned by DFID show up UK Government badly against what could reasonably be expected of it. This is more than 10 years on since the last FAC report on UKOTs which recommended: “that the Government should focus funding on infrastructure in Montserrat on those areas that are most likely to assist the development of tourism on the island.” Sadly, little has changed despite the valiant efforts of many Montserratians and some overseas NGOs.

42. Also the harbour in Tristan da Cunha is still being patched up. FCO should take a strong interest in this, as this is the mainstay of a thriving community in the Tristan da Cunha. Specialists have advised that long-term investment in a properly structured harbour would be more cost effective than one, which needs almost annual maintenance.

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