

## Christopher Betts Environmental Biology – EclA Guidelines Comments

I have had a read of the latest Consultation Draft of the Guidelines for EclA – they really are quite excellent and do huge credit to you and your Steering Group. It is amazing how things have changed since the early days and I cannot believe it is a decade since the IEA originally presented its Guidelines for Baseline Ecological Assessment at the House of Commons. I was a member of that Steering Group and I remember how much time it took.

I don't know if it is of any help but I made a few notes (using "track changes" as I was reading through and they are on the attached file version. (Not all the edits are mine as some were on the "track changes" when I opened the document from the web site, but my comments have my initials (CJB). )

Also, and again I don't know if it is any help, but after consulting work by Manchester and Southampton Universities as well as drawing on our own EIA experience, we have identified sixteen common deficiencies in the ecology sections of Environmental Statements. The new Guidelines deal with many of these but perhaps there are a few other ideas to focus on, too:

1. Poor or absent scoping and an inadequate or non-existent statement of objectives.
2. Absence of a full description of methods used in the EIA thus preventing a judgement on the suitability or thoroughness of the procedures employed in sampling, survey, analysis or statistically based deduction.
3. Poorly presented or inadequate, unsupported results which therefore preclude an allocation of any confidence level to the findings.
4. Little or no discussion of the limitations of methods used.
5. Poor handling of uncertainty and probability and a lack of predictive analysis.
6. Lack of appreciation of what is relevant to those making decisions from the EIA results.
7. Absence of stated criteria on which conclusions have been drawn in the Environmental Statement and a lack of appropriate, quantified data, or sometimes of any numerical data at all.
8. Omission of survey of, or consideration of impacts on, important groups of organisms such as bryophytes, lichens, fungi and invertebrate animals.
9. Little, no or incorrect use of biological indicators or indices in the assessment process.
10. Confusion between "nature conservation" and "ecology" (almost universal).
11. No consideration of adjacent, down-stream or remote ecosystems which might be directly or indirectly affected by the project.
12. No enforceable commitment to mitigation of negative effects, or to aftercare, monitoring and management.
13. No discussion of alternative sites.
14. No cross-referencing to other chapters of the Environmental Statement.
15. No Non-Technical Summary.
16. No statement of the qualifications and experience of those undertaking the EA and writing the Environmental Statement.

I expect you will have a demanding task putting all the consultee responses together. Good luck and, again, congratulations on a fine and much needed piece of work.

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