

25-Year Environment Plan

CIEEM response to the Environmental Audit Committee inquiry

28 February 2018

Introduction

The UK Government published its 25-Year Environment Plan in January 2018. CIEEM applauded the government for the ambition of the Plan and its long-term vision. There are many aspects of the Plan that CIEEM believes, if properly funded and implemented, could make a real difference to halting the current rate of environmental degradation and help build a healthier, more resilient environment for future generations.

We were particularly pleased with the continued aspiration for a Green Brexit, for the UK to demonstrate global leadership, the intention to fully recognise and utilise the societal benefits of a healthy natural environment, the inclusion of the environmental net gain approach for development, reiterating the commitment to a consultation on a new environmental scrutiny body, the desire to reconnect people and nature, and the UK Government's willingness to work collaboratively – especially with the devolved administrations.

The Plan rightly sets out the importance of the natural environment to people and the economy, and the huge challenges facing the natural environment. These challenges also unfortunately highlight some of the shortcomings of the Plan, which is an ambitious vision but uses weak, non-committal language and lacks detail on immediate action.

The Plan sets out a “blueprint” but no legally-binding targets, and where there are targets they are too far into the future. Experience of the failure to meet the previous government target of halting biodiversity loss by 2020 should remind government of the fact that such ambitious targets require bold, timely action. Action needs to start during this Parliament, and there is an urgent need for the government to set out what it is proposing to deliver by 2022. Also, if the ambitions of the Plan are to be realised there will need to be strong legislation underpinning it, such as a new Environment Act. Government should aim to deliver the Act in this Parliament

The Plan does not set out how delivery of the government's ambitions will be funded and resourced, and how all departments across government will play their part in delivering it. There are some small funds allocated to distinct projects, but enhancement of the environment needs much more robust and secure funding and resources.

Primacy of Environmental Protection

In order to deliver such a challenging vision, all of government needs to be involved. This is not a plan to be delivered solely by Defra; it has implications across all the functions of Government. The Secretary of State in his foreword to the Plan stated that “*respecting nature's intrinsic value, and the value of all life, is critical to our mission*”. In order to deliver this, all departments must review all of

their policies in light of their impacts on the natural environment, and their abilities to contribute to the delivery of the 25-Year Plan.

Using and managing land sustainably

Government must use legislative and policy approaches to reverse the loss of biodiversity and restore habitats and species to healthy, ecologically functional entities. Government must set a strong regulatory floor to protect and enhance our natural capital and ecosystem services in all land use management (and provide the resources to do so) through integrated spatial planning, including the marine environment out to 200nm.

Government must add environmental principles to the legislative body. These include the Preventive Principle (to avoid or restrict activities, policies and plans that risk harm to the natural environment) and the Precautionary Principle (such that when there is evidence that an activity may cause harm to the environment, a precautionary approach to decision-making will be taken even if some cause and effect relationships are not fully established scientifically).

CIEEM was delighted to see that government included our biodiversity net gain principles, which we are now developing with our partners into guidance for industry. However, we would like to see commitment from government to expand these further into a landscape-scale approach which includes agriculture. We also recommend that the approach must be mandatory in national planning policy, and guaranteed resources for local authorities and statutory agencies to implement this.

CIEEM is already working very closely with Natural England on reform of protected species licensing (e.g. district licensing). Licensing reform provides the opportunity for win-win outcomes for both nature and development, but only if delivered appropriately. CIEEM will continue to work with Natural England on this and we would welcome discussing this further with the Committee.

Government must establish new sustainable environmental funding mechanisms. These should include only mechanisms (including grants, subsidies and tax credits) that provide public benefits such as biodiversity net gain, flood management, and carbon sequestration. The new mechanisms will need to be set out in legislation and we look forward to the forthcoming Command Paper and Agriculture Bill. Support for technical advice to farmers is also very welcome and something that CIEEM members already deliver on the ground. CIEEM supports the proposed combination of accessible and targeted schemes, provided that they are not antagonistic/counter-acting as the current farm subsidy system can be.

CIEEM is pleased to see the prominence of soils, peatland and woodlands in the plan, but these need stronger commitments of action.

We are also happy to see reference to the importance of evidence and science in decision-making, especially with regards to natural capital accounting. Government must ensure that decisions affecting the environment are made by competent professionals, linking together practice, research and policy. To deliver this, government must facilitate investment in developing skills and standards for professional ecologists and environmental managers who are charged with implementing actions to deliver outcomes.

Recovering nature and enhancing the beauty of landscapes

The targets given for restoring thriving plants and animals are laudable – such as restoring 75% of protected sites to Favourable Conservation Status, creating 500,000ha of habitat outside of protected areas, protecting vulnerable species, and increasing woodland cover – but these must

have timeframes attached to them that have at least some targets/milestones within the current Parliament.

CIEEM welcomes the development of a Nature Recovery Network, guided by the Lawton principles, that will deliver a coherent network of more, bigger, better, joined up protected sites. CIEEM recommends that government establishes a system of protected international, national and local sites that collectively create an ecologically coherent network, including cross-border sites and the marine environment out to 200nm. These protected sites must be fit for purpose, including in relation to protecting wide-ranging species and be relevant in the context of a changing climate.

For the marine environment, government must make a firm commitment to restoring marine biodiversity. CIEEM advocates moving to a holistic management approach for the marine environment, with a marine planning system that integrates sustainable fisheries with other activities such as infrastructure, energy, transport and recreation.

Government must implement stringent measures to maintain biosecurity, restrict the spread of non-native invasive species and control the use/spread of genetically modified species. Government should also facilitate the continued work of the GB Non-Native Species Secretariat (NNSS). We recommend that government must include a review of the badger culling programme, and we welcome Defra's announcement to review its overall bovine TB strategy.

In restoring nature, government must legislate for and apply the Polluter Pays principle so that those whose activities risk or result in harm to the natural environment will pay the costs of managing and/or restoring/remediating the damage. Diffuse pollution can be wide-ranging and therefore government's approach will be consistent across borders.

Connecting people with the environment to improve health and well-being

There are multiple health and well-being benefits from access to, and connecting with, nature and green space. Government must therefore set clear goals and targets for investing in mechanisms to facilitate greater access and engagement with the natural environment across all sectors of society, especially urban populations. We welcome the Government's pledge to plant one million urban trees, and suggest that the appropriate target should be to deliver a net gain of one million trees, taking account of the large numbers of street trees lost each year to improve ease of contracted-out maintenance. We welcome the proposal to make 2019 a year of action for the environment, and our members would welcome the opportunity to work with Government and 'Step Up To Serve' to facilitate this.

Protecting and improving our global environment

Restoring global biodiversity and ecosystem functioning is a global imperative in which the UK must play its part. Government must strengthen its active participation in international conventions and treaties, seeking opportunities to lead in areas where we have particular expertise.

Devolved collaboration will be critical to delivery of the Plan. The natural environment and the challenges that it faces do not recognise national borders and it is vital that government works with the devolved administrations and others – including the UK's Overseas Territories, the Republic of Ireland, and other EU member states – to achieve its admirable ambitions. The UK nations must collaborate, sharing knowledge and best practice, with each other and with our neighbours regarding all aspects of environmental protection and enhancement. It is currently unclear how much of government's vision is shared with devolved administrations, who have been more

ambitious in environmental protection and standards in recent years and have considerable expertise to share.

The UK governments must work together through the Joint Nature Conservation Committee to collate evidence and report on delivery of our collective international obligations. These obligations include, but are not limited to, the Aichi Biodiversity Targets, the UN Sustainable Development Goals, and the Paris Climate Accord.

Putting the Plan into practice

The Plan states that government *“will work with scientists, economists and environmentalists, including the Natural Capital Committee (NCC), to develop, by the end of 2018, a set of metrics that will chart our progress towards a better environment, ensuring transparency and accountability.”* These metrics will be vital to measuring successful delivery of the Plan and it is important that these metrics measure meaningful improvements in natural capital, biodiversity and ecosystem functioning, rather than a tick-box exercise to undertake a particular action. CIEEM and its members are well-placed to help develop the metrics that will measure government delivery.

CIEEM recommends that Government must establish and appropriately resource world-leading data-sharing, monitoring and reporting mechanisms to provide public and stakeholder accountability, and produce regular, mandatory 'State of the Environment' and 'UK Global Environment Footprint' reports.

It is disappointing that the 25-Year Environment Plan uses so much non-committal language (e.g. encourage, explore, investigate, consider). For the Plan to deliver meaningful outcomes it must have a legislative underpinning, including legally-binding targets.

A new independent scrutiny body will be vital for holding government and competent authorities to account post-Brexit. CIEEM looks forward to the forthcoming consultation. CIEEM believes that the body should be UK-wide, designed by consensus with the devolved administrations, and should work in collaboration with the Joint Nature Conservation Committee (JNCC) and the UK courts system.

Conclusion

CIEEM and its members have a wealth of practitioner expertise and experience. Ecological and environmental practitioners working to high professional standards will be critical to the successful delivery of this agenda and we look forward to working closely with all UK governments on its delivery, sooner rather than later.

CIEEM, with the distinct approach and expertise of practitioners, would welcome the opportunity to present further evidence to the Environmental Audit Committee.