

# CONSULTATION

## Response Document



**Consultation on Environmental Targets  
(Department of Environment, Food and Rural Affairs)**

**27 June 2022**

## Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Scottish Environment Link
- Northern Ireland Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

This response was coordinated by our [England Policy Group](#). We welcome the opportunity to participate in this consultation and we would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at [JasonReeves@cieem.net](mailto:JasonReeves@cieem.net) with any queries.

## General Comments

We welcome the opportunity to respond to this consultation on Environmental Targets. These targets have the potential to improve clarity and consistency for delivery of nature conservation and management measures and set nature on a path to recovery. However, in our view the targets are not ambitious enough, in their current form, to halt environmental decline.

We support the Wildlife and Countryside Link's calls for a clear set of outcome targets under relevant apex targets. Interim targets and milestones to measure progress along the way are also needed. Targets should be ambitious and stretching, yet achievable. However, in some cases the evidence packs published by Defra suggest that the Government could go further but this is not reflected in the targets given, for example in the long-term wider habitats target.

We are confused by the incoherence of the target timelines, as they do not align with each other nor with existing targets making them unnecessarily complex. Aligned target years would simplify the process for those working to meet them.

There is also nothing in the targets on soils, invasive species or nitrogen in the water environment. These are critical issues to achieving the targets that are proposed and thus should be given action targets.

We are pleased to see the Government recognising that finance and capital has a critical role to play in reaching these targets, and that a step change in investment flows is needed. However we are disappointed that no public funding is mentioned. If these targets are to be met there must be public funding, at least to prime private investment but we suggest this go further to support the public bodies that will be tasked with delivering these ambitions.

Linked to funding and resourcing, there is no mention of who will collect the data that underpin the targets and we are concerned that this will be left to NGOs, volunteer recorders and citizen scientists. There must be a fully resourced plan to collect ongoing data to inform progress against the targets.

## Responses to Consultation Questions

### Target proposals for biodiversity on land

**Do you agree or disagree that the proposed combination of biodiversity targets will be a good measure of changes in the health of our 'biodiversity'?**

[Agree/**Disagree**/Don't know]

**[If disagree] What additional indicators do you think may be necessary?**

We are extremely disappointed that there is no target for the condition of protected sites. Protected sites represent our most ecologically important and threatened habitats, yet many of them are in poor condition and in fact are still declining<sup>1</sup>. It is essential that the goals in the 25

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/992970/Outcome\\_Indicator\\_Framework\\_for\\_the\\_25\\_Year\\_Environment\\_Plan\\_2021\\_Update.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/992970/Outcome_Indicator_Framework_for_the_25_Year_Environment_Plan_2021_Update.pdf)

Year Environment Plan to address this are made legally binding. Achieving this alongside the goal for wider habitat creation and restoration will help build an ecologically resilient network.

The details of condition monitoring and enforcement will be particularly important. For example, there has been much recent criticism of marine protected areas around the UK being nothing more than 'paper parks' which exist as designations, but within them there is a lack of comprehensive management and monitoring to improve the condition of ecosystems<sup>2</sup>. More detail is needed to ensure that the target cannot be met via tweaks to designation paperwork but rather requires targeted action to improve features.

There is an opportunity here to combine site improvement targets with a commitment to improve common standards monitoring.

It is unclear how the biodiversity targets will be integrated across Government departments and functions, and in particular with planning, infrastructure and agriculture. It is critical that biodiversity restoration is embedded across Government.

**Do you agree or disagree with the level of ambition of a 10% increase proposed for the long-term species abundance target?**

[Agree/Disagree/Don't know]

**[If disagree] What reasons can you provide for why the government should consider a different level of ambition?**

The species abundance target indicates a positive shift towards a focus on nature recovery in addition to conservation. However the proposed target is unambitious and the baseline being set for 2030 makes it impossible to determine whether it will actually deliver net increases in abundance, given ongoing declines of over 2% per year. It also means that progress cannot be measured until the baseline is measured. The baseline should be set at a 2022 baseline to encourage action and accountability from the beginning.

We welcome the range of species being used for this indicator and the limitations imposed by data availability. However there are some key groups that remain under-represented (such as marine species and pollinators) which need to be included in the target from the outset.

Reporting against the target should set out how the index has changed by taxa and species so the data can be scrutinised and action targeted.

The above concern is amplified by the comparison made between the supposedly 'ambitious' 10% target and the present 2% annual decline in priority species made in the document – the current proposal could well allow for the continued declines of priority species, by concealing it with increases on non-priority species.

We note that the target only measures abundance, and that this was considered in the evidence pack, but measuring distribution in addition to abundance would ensure that we do not protect species only in isolated pockets (e.g. in designated sites) but across the landscape. Some measure

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<sup>2</sup> [https://www.britishecologicalsociety.org/wp-content/uploads/2022/04/BES\\_Protected\\_Areas\\_Report.pdf](https://www.britishecologicalsociety.org/wp-content/uploads/2022/04/BES_Protected_Areas_Report.pdf)

of connectivity is also required.

**Do you agree or disagree with the ambition proposed for the long-term species extinction risk target to improve the England-level GB Red List Index?**

[Agree/**Disagree**/Don't know]

**[If disagree] What reasons can you provide for why the government should consider a different level of ambition?**

We support the proposal to focus on the new England-level GB Red list and welcome a target on reducing extinction risk as this ensures we are maintaining a focus on the most at-risk species. However this target offers no quantifiable target improvement and therefore lacks measurability.

The issue outlined in the evidence paper that major achievements would only result in a small shift in the Red List Index should not result in removal of the measurable target, but can be communicated in a way that represents the reduction in threat level that has been achieved.

We disagree with updating assessments every 10 years. This needs to be every 5 years. At 10 year intervals a species could go into steep decline and it might then be too late to implement actions to save it.

One of our main concerns with the proposed changes to Schedule 5 of the Wildlife and Countryside Act was that it was based on the conservation listing at too high a degree of extinction risk – i.e. de-listing species such as adder has the potential to cause localised extinction in certain parts of the UK<sup>3</sup>. Whilst basing monitoring on a more local scale than GB is a welcome first step, it would help to progress this by identifying species that were regionally vulnerable or endangered – to avoid impoverishment of biodiversity in particular parts of England.

**Do you agree or disagree with the level of ambition of 'in excess of 500,000 hectares' proposed for the long-term wider habitats target?**

[Agree/**Disagree**/Don't know]

**[If disagree] What reasons can you provide for why the government should consider a different level of ambition?**

The 500,000ha creation and restoration target is too low, and would not contribute much to the Government's own 30x30 ambitions (4% of land area). The higher target of 750,000ha was supported by 69% of those in the expert workshop and confidence in it being achievable significantly increased when presented with details of current delivery and measures. Therefore, we would recommend this is adopted as a stretching target.

The action-based nature of the target leaves us in danger of ending up in a situation where things are counted as 'restored' simply because some form of intervention has been agreed to be implemented – not because it has actually worked. We urge the Government to prioritise the

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<sup>3</sup> <https://cieem.net/resource/cieem-response-to-the-qqr7-july-2021/> ; <https://cieem.net/resource/qqr7-consultation-response-30-january-2022/>

introduction of the outcome-based indicator for the Quantity, Quality and Connectivity of Habitats so progress against this target can be outcome-focused.

We are concerned that the target is not a net gain of 500,000 ha, as it will include interventions like BNG and ELMs that are not delivered in perpetuity. We could feasibly be in the situation where records show that 500,000 ha have been created but that in reality because of some sites then being changed to other uses ending up with far less. Sites created as part of the 500,000 ha need to be done so in perpetuity for future generations, making use of measures such as conservation covenants. Other sites could also be lost or damaged further reducing the net delivery of habitat.

A measurement of habitat being lost is urgently needed and should be factored into an overall net increase target for wider habitats.

In addition, we are concerned that some sites could be double counted, if for example the same site is used for multiple intervention types (BNG, ELMs, etc.) and these are counted without the recognition that it is the same site.

As in our response on protected sites, securing good condition of the habitats will be crucial to realising the benefits of this target. We suggest that in delivery of new habitat, the Lawton Principles of “more, bigger, better and joined up” are employed.

**Do you agree or disagree that all wildlife-rich habitat types should count towards the target?**

**[Agree/Disagree/Don't know]**

**[If disagree/Don't know]**

See below.

**Are there any habitat types that you think should not count towards the target?**

**[[peatland], [grassland], [heathland], [scrub], [native woodland], [hedgerows], [traditional orchards], [arable field margins], [estuarine and coastal water habitats], [wetlands], [rivers / streams], [lakes / ponds], [other habitat types that you think should not count towards the target]]**

We suggest that the following habitats are not included:

- Arable Field Margins
- Coastal Water Habitats
- Other woodland: broadleaved

**What reasons can you provide for why these habitats should not count towards the target?**

Arable Field Margins

We recognise that they can provide valuable habitat for wildlife but are often short lived and poorly managed. We are uncertain how they will monitor losses. Regular losses and gains in different places will not help support long term populations of species that rely on them.

### Coastal Water Habitats

Our concern is not with the inclusion of these habitats per se, but with the use of modelling actions to determine their restoration without on the ground monitoring to assess whether the threshold for “wildlife rich” has been reached.

### Other woodland: broadleaved

This habitat is included due to its inclusion in the list of medium distinctiveness habitats in the Biodiversity Metric but there is no specification that this woodland should be native. We do not think that the creation of non-native woodland of uncertain value to wildlife should form part of the metric.

## Target proposals for biodiversity in the sea

**Do you agree or disagree with the level of ambition proposed for the Marine Protected Area target?**

[Agree/Disagree/Don't know]

**[If disagree] What reasons can you provide for why the government should consider a different level of ambition?**

We welcome a condition target for MPAs. As mentioned in our response on the suite of biodiversity targets, there are ongoing pressures within MPAs due to there being little change in practices that are allowed within them. Despite the feature-based approach being taken to designation, the whole site must be managed appropriately to protect and restore habitats and species. A whole-site approach should also be taken towards monitoring, using features as key indicators of success.

The target for 70% of MPAs in favourable conditions falls below the lowest end of estimates of what is readily achievable, as stated in the evidence packs, and is not additional to existing requirements to achieve favourable status. Therefore the proposed target is not ambitious enough to address the ongoing pressures on MPAs and wider seas. We would propose increasing the ambition towards the stretching yet achievable range (e.g. 80%).

The network of SSSIs not designated as SACs or SPAs should be included in the target to ensure that important features are not missed.

We support Wildlife and Countryside Link's response that a holistic approach to achieving GES is needed in the marine environment, and this should include sustainably managing seas outside of MPAs.

## Target proposals to improve water quality and availability

**Do you agree or disagree with the level of ambition proposed for an abandoned metal mines target? [Agree/Disagree/Don't know]**

**[If disagree] What reasons can you provide for why government should consider a different level of ambition?**

No comment

**In addition to the proposed national target, we would like to set out ambitions for reducing nutrient pollution from agriculture in individual catchments. Do you agree or disagree that this approach would strengthen the national target? [Agree/Disagree/Don't know]**

**[If disagree] Why don't you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target?**

**[If agree] Why do you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target? What factors should the government consider when setting these ambitions?**

An individual catchment approach would support targeted and bespoke mitigation methods and prevent an inflexible 'blanket' approach. It would need to be based on detailed monitoring and modelling to determine environmental critical limits and identify best solutions.

**The target needs to allow flexibility for water companies to use best available strategies to reduce phosphorus pollution, including the use of nature-based and catchment-based solutions. Do you agree or disagree that the proposed target provides this flexibility? [Agree/Disagree/Don't know]**

**[If disagree] What reasons can you provide for why the target doesn't give this flexibility?**

No comment

**Do you agree or disagree with the level of ambition proposed for the nutrient targets?**

**[Agree/Disagree/Don't know]**

**[If disagree] What reasons can you provide for why government should consider a different level of ambition?**

#### **Apex target**

We support calls for an apex target for the status of the water environment, once the existing targets are passed. This will set an overall outcome focus that builds on the successes of the River Basin Management Plans, and which the action targets proposed will help to achieve. We feel the targets as given represent an overall weakening of those under the Water Framework Directive.

#### **Agriculture nutrient target**

The agriculture target should be set at a level which can deliver Good Ecological Status and take a more ambitious approach to delivering the necessary cuts, e.g. in meat consumption models as detailed by Wildlife and Countryside Link.

We are concerned that this relates to pollutant load rather than actual concentrations of pollution measured in waterways. The reasons given for this are the time-lag between action being taken and the outcomes in waterways, along with other factors making it difficult presumably to attribute a particular percentage of measured pollutants to agriculture. Our concerns with a load-focused approach are that modelling actual nutrient loss from farmland is very difficult, and in members' experience it tends to be based on what individuals say they do rather than what they actually do – which could be very different. We note this is mentioned in the evidence pack on



page 53 where the Water Expert Advisory Group (WEAG) stressed that “*biology within rivers responds to the local concentrations, not the load.*”

Additionally, there is no guarantee of ecological benefit through load reduction, whereas focusing on achieving existing thresholds will indicate that the zone where improvement is possible has been achieved. Concentrations and loads do have a place in the process but ultimately we should be measuring success by ecological benefit not an individual’s actions.

The EA (and other UK agencies) have done considerable work to define appropriate target concentrations<sup>4</sup>. It may be more appropriate for the overall ambition to be to meet these targets for a certain proportion of sites rather than simply express the target as a single overall percentage. Otherwise regulators will target “low hanging fruit” to pull down concentrations, but the end result may still be concentrations that are too high to support a healthy ecosystem.

Furthermore, the measures envisaged to change the current impact of Catchment Sensitive Farming are largely more of the same – more voluntary advice to farmers, more stewardship schemes etc. These may benefit from more innovative approaches to improve performance.

### **Wastewater target**

It is concerning that the target for reducing nutrient pollution from wastewater relates to phosphorus only and not nitrogen. The justification for this is that phosphorus is more harmful to the freshwater environment than nitrogen. Whilst this is correct, nitrogen is more harmful to the marine environment, which seems to have been overlooked when rivers flow into the sea.

The evidence report recognises that most of Europe already has standards for nitrogen in freshwaters<sup>5</sup> and yet this is not reflected in the target suggesting the UK is lagging behind on the issue. The UK Technical Advisory Group on the Water Framework Directive has recently introduced a nitrogen standard for lakes further highlighting the importance of addressing nitrogen pollution in freshwaters. Additionally, the Government’s own WEAG suggests 1.5-2 mg N/l is the threshold for Good Ecological Status.

This target entirely overlooks the near moratorium on new development that has been created by the damage currently being done to European sites in the Solent and elsewhere. In our view this target is inadequate – it does nothing to rein-in the excessive nitrogen pollution currently being delivered to the marine environment (either directly or via discharge to rivers that then end up in the sea). In Hampshire, there is a postcode lottery whereby some Wastewater Treatment Works near the coast have fairly strict nitrogen permits, but others further from the coast have no nitrogen permit levels at all set for them, even though they still discharge into a river that empties into the sea. The absence of nitrogen-related targets for wastewater is justified on cost grounds, however it is likely that many actions to reduce phosphorus can also reduce other pressures. In our view nitrogen is a serious omission that should be addressed with an ambitious target in line with good ecological status thresholds.

The phosphorus reductions target also seems to rely on monitoring undertaken by water companies and the Environment Agency – in our members’ experience the EA stopped doing

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<sup>4</sup> [www.wfduk.org](http://www.wfduk.org)

<sup>5</sup> Kelly, M., Phillips, G., Teixeira, H., Salas Herrero, F., Várбірó, G., Kolada A., Lyche Solheim, A., Poikane, S. *Physico-chemical supporting elements in inland waters under the Water Framework Directive: a review of national standards to support good ecological status*. EUR 31040 EN, Publications Office of the European Union, Luxembourg, 2022. ISBN 978-92-76-51133-5, doi:10.2760/470539, JRC127875.

comprehensive monitoring in about 2010 (datasets for waste water treatment works were more comprehensive prior to this time and further cuts continued to be made). Monitoring must be robust and comprehensive before the success of meeting this target could be judged. Monitoring should also cover both nutrient concentrations and biological responses. The current system of water companies often self-reporting is not good enough.

**Do you agree or disagree with the level of ambition proposed for a water demand target?**  
[Agree/Disagree/Don't know]

[If disagree] What reasons can you provide for why government should consider a different level of ambition?

No comment

## Target proposals for woodland cover

**Do you agree or disagree with the proposed metric for a tree and woodland cover target?**  
[Agree/Disagree/Don't know]

We agree with a target to increase woodland cover in England, provided that it is the appropriate woodland as guided by the ecology of the site and advised by a competent ecological expert. Any tree planting programme on existing habitat should be subject to an Environmental Impact Assessment (or equivalent, recognising this system is proposed to be replaced under the Levelling Up and Regeneration Bill).

We welcome that this target will be a net increase in cover but support calls for an updated assessment of the estimated additional 4.4% existing cover from small trees and woods outside of the National Forest Inventory.

We are also pleased to see natural regeneration/colonisation included in the target. Both tree planting and natural establishment should follow the principle of using the 'right tree in the right place'.

As highlighted in our responses on protected sites and wider habitats, improving the condition of our existing woodlands, and securing ongoing management and monitoring, is critical and should be set out clearly in plans for delivering this target.

As Wildlife and Countryside Link has highlighted, this target has the potential to dominate the delivery of the 500,000ha (or more once finalised) of wildlife rich habitat under the wider habitats target. The wider habitats target should deliver a full suite of diverse habitats, in places where they are suited in terms of their ecological, climatic and edaphic requirements. As such, we support the Wildlife and Countryside Link's call for only native woodlands identified as a priority in Local Nature Recovery Strategies to count towards the wider habitats target

**Do you agree or disagree that short rotation coppice and short rotation forestry plantations should be initially excluded from a woodland cover target?** [Agree/Disagree/Don't know]

We agree that the above should be excluded as they will not, in the long term, contribute to carbon storage and sequestration. Short rotation forestry for biomass energy should not be included in the target at a later date.

Rotation coppicing in line with the UK Forestry Standard can suppose nature recovery and so should be recognised for its contribution towards these goals.

**Do you agree or disagree with the proposed inclusion of trees in woodlands, as well as trees in hedgerows, orchards, in fields, and in towns and cities? [Agree/Disagree/Don't know]**

All trees have value – whether for climate mitigation, biodiversity, human health and well-being etc. – though it must be recognised that there are differences in the benefits depending on the setting of the tree(s). Trees in urban areas have significant benefits for cooling and shading, air quality and mental health.

**Do you agree or disagree with our proposed level of ambition for a tree and woodland cover target? [Agree/Disagree/Don't know]**

**[If disagree] What reasons can you provide for why the government should consider a different level of ambition?**

We support this level of ambition based on the Climate Change Committee's advice however our main concern is with how this is delivered, as discussed above.

Clarification of the target should include a preference for native woodlands and encouragement of natural colonisation.

Although the sentiment of 'more trees in the right place' is right, there are still many examples of this not being applied, for example, in recent projects that have seen the draining of millennia old peat bogs or the destruction of species-rich grasslands, to enable woodland planting to take place for supposed carbon sequestration benefits. Draining peat bog to plant a Sitka Spruce plantation will neither enhance biodiversity nor sequester carbon.

We agree that England needs more appropriate woodland cover, however, many other habitats are in greater need of protection and restoration (e.g. lowland meadows). Indeed, consideration should be given to the most appropriate habitat for the site as determined by a competent ecological expert and wider land-based climate mitigation policies must be expanded to recognise the latest research that promotes utilising the full suite of high-carbon habitats in areas that are suited to their edaphic and climatic requirements<sup>6</sup>.

We would have liked to have seen far more qualification here about what types of woodland planting (and on what existing habitats) are excluded from being counted towards the target that

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<sup>6</sup> P. Anderson (2021) *Carbon and ecosystems: restoration and creation to capture carbon*. Available at: <https://cieem.net/resource/carbon-and-ecosystems-restoration-and-creation-to-capture-carbon/>;  
R. Gregg, J. L. Elias, I. Alonso, I.E. Crosher, P. Muto and M.D. Morecroft (2021) *Carbon storage and sequestration by habitat: a review of the evidence (second edition)* Natural England Research Report, NERR094. Natural England, York.

has been set.

There must be consideration given to how the new woodland/sites will be managed for both short term establishment (e.g. deer and rabbit management) and long term management to maintain a biodiverse stand.

## Target proposals for resource efficiency and waste reduction

Do you agree or disagree with the proposed scope of the residual waste target being 'all residual waste excluding major mineral wastes'? [Agree/Disagree/Don't know]

[If disagree] What reasons can you provide for why the government should consider a different target scope?

No comment

Do you agree or disagree that our proposed method of measuring the target metric is appropriate? [Agree/Disagree/Don't know]

[If disagree] What reasons or potential unintended consequences can you provide or foresee for why the government should consider a different method?

No comment

Do you agree or disagree that local authorities should have a legal requirement to report this waste data, similar to the previous legal requirement they had until 2020? [Agree/Disagree/Don't know]

No comment

Do you agree or disagree with the level of ambition proposed for a waste reduction target? [Agree/Disagree/Don't know]

[If disagree] What reasons can you provide for why the government should consider a different level of ambition?

CIEEM would like to see a parallel target to reduce overall resource use (along with residual waste and resource productivity), helping a transition towards a circular economy.

Additionally, we advise against using GDP in measuring resource productivity. GDP is an inefficient measure of progress and prosperity, which doesn't account for the wider benefits of natural capital.

Do you agree or disagree with our proposed metric for considering resource productivity? [Agree/Disagree/Don't know]

**[If disagree] What reasons, or potential unintended consequences can you provide for why the government should consider a different metric and what data exists to enable reporting for this alternate metric?**

No comment

**Of the possible policy interventions described, which do you think will be most effective to meet a resource productivity target? Please specify whether these policies would be most effective if implemented nationally or regionally, and whether measures should be product or sector-specific.**

No comment

## **Target proposals for air quality**

**Do you agree or disagree with the level of ambition proposed for a PM2.5 concentration target? [Agree/Disagree/Don't know]**

**[If disagree] What reasons can you provide for why the government should consider a different level of ambition?**

The air quality target level is double the World Health Organisation's updated guidelines which is that annual average concentrations of PM2.5 should not exceed 5 µg/m<sup>3</sup> and the evidence pack provided suggests the target is achievable in a much shorter timescale with ambitious measures brought in.

In addition to human health concerns, impacts on the environment must be evidenced and action targets should be set for those air pollutants that also impact on biodiversity, including NO<sub>x</sub>, SO<sub>x</sub>, NH<sub>4</sub> and O<sub>3</sub>.

**Do you agree or disagree with the level of ambition proposed for a population exposure reduction target? [Agree/Disagree/Don't know]**

**[If disagree] What reasons can you provide for why the government should consider a different level of ambition?**

We are concerned that the 35% target will focus on affluent communities and that poorer, disadvantaged communities will be left with poor air quality, as is seen in current trends<sup>7</sup>. The sources of air pollution are often near/in more disadvantaged communities, so Government must focus on the causes of air pollution at source (transport, construction, energy, agriculture, etc.), and prioritise improving air quality in the worst affected areas.

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