

The Rt Hon Emma Reynolds MP
Secretary of State for Environment, Food and Rural Affairs
Defra
Seacole Building
2 Marsham Street
London
SW1P 4DF

11 December 2025

Subject: Biodiversity Net Gain Exemptions

Dear Secretary of State,

I am writing on behalf of CIEEM's nearly 10,000 members to set out our concerns regarding possible changes to Biodiversity Net Gain (BNG) in the forthcoming Government response and to reaffirm our support for Defra's evidence-led approach.

1. The importance of maintaining ecological integrity

BNG is one of the most significant policy tools for contributing to nature's recovery. The suggestion that development and nature are in conflict misrepresents the evidence: well-designed development enhances resilience, creates high-quality places and supports long-term economic and public health outcomes.

2. Risks of large-scale exemptions

We are concerned about broad exemptions, particularly for Nationally Significant Infrastructure Projects (NSIPs) and smaller sites, and we understand that Defra shares these concerns. Proposals to exempt all sites under 0.5 ha would:

- **Remove nature from communities**, undermining health, resilience and place-making.
- **Risk harm to priority habitats**, which must never be exempt.
- **Destabilise private finance nature markets**, reducing private investment at a crucial stage in the development of these markets.
- **Disadvantage SMEs and entrepreneurial start-ups**, who have prepared and invested extensively for BNG and would face job and income losses.
- **Damage both domestic and international confidence** in the consistency and credibility of the policy.

3. Evidence must underpin exemptions

We are concerned that no evidence has been published by any Government department to justify larger exemption thresholds. Given the financial and ecological risks, we must insist that an evidence base be presented before decisions are taken.

4. A proportionate and workable solution

CIEEM supports a 0.1 ha exemption, which reduces burdens on the smallest developers while maintaining the policy's integrity. This approach is proportionate, pragmatic and supported by the eftec modelling¹.

5. Continued collaboration

With Government's response to the BNG consultations still pending, there is a vital opportunity to ensure the final policy supports nature's recovery and Government's wider objectives for healthy, resilient and attractive places.

CIEEM stands ready to assist Defra in championing a strong, evidence-based BNG framework that works for nature, communities and developers alike.

Yours sincerely,



Sally Hayns
Chief Executive Officer

¹ <https://cieem.net/new-research-shows-government-should-not-exempt-all-small-bng-sites/>