

OPPORTUNITIES FOR CHANGE - IES RESPONSE

IES is the professional association for environmental scientists and for the last 26 years its members have supported and encouraged a holistic approach to environment and development issues and solutions based on sound science. It does this through education and training programmes for its members and by setting professional standards. It also undertakes education activities aimed at other professionals and the wider public.

We have read the document with interest and are happy to submit our observations and recommendations for your consideration. These are divided into two sections:

1. General observations on the document as a whole.
2. Answers to specific questions as requested. These cover only those sections where we have sufficient expertise to make informed comment and recommendations.

GENERAL COMMENTS

IES welcomes the opportunity to respond to the Government's document 'Opportunities for Change'. IES supports the approach of broad consultation in the development of the Sustainable Development Strategy and the Government's commitment to put sustainable development at the heart of its policies. IES shares your vision of a sustainable society built on new integrated ways of thinking about choices across government and throughout society.

While welcoming the consultative approach, we would have preferred an approach based on participation in which government and representatives of the different interest groups identify the issues and plan the solutions together. Such an approach we feel would develop a stronger sense of ownership of the strategy by the various groups involved.

The document assumes that perpetual economic growth is compatible with the goal of sustainable development. We feel this assumption is unproved. Unless it can be demonstrated, the whole sustainable development programme is undermined. There appears to be a second assumption, albeit implicit, that the ingredients of quality of life are determined solely by economic growth. Is economic growth the right criteria to use? Would it not be preferable to use the human development index as a measure? At least, the indicators used to measure economic growth need to be revised so that the destruction of the environment and its subsequent repair do not both appear on the balance sheet as economic progress when all that has been achieved is a return to the status quo.

IES feels that the document needs to address these issues more thoroughly because they represent the foundation on which to build sustainable development plans.

ANSWERS TO SPECIFIC QUESTIONS

Achieving sustainable development

We feel a change of priorities is required, from one where environment and other issues are considered as subsets of economy to one where economy is considered a subset of environment. We recommend developing ways of measuring economic growth which take environmental costs

into account. Better still, use another indicator such as the human development index. We recommend that life-long education and training are identified as priorities because without them people will not have the knowledge, understanding, skills and motivation needed to respond to the challenge of achieving sustainable development.

Sustainable development is a holistic concept which needs to be addressed in manageable parts. The role of government should (as recent years have shown) be to fulfil three basic functions:

- Regulation with targets and objectives.
- Modification of market forces to encourage positive developments rather than short term expediency.
- Support programmes which aid and inform less powerful groups/members of society thus enabling greater involvement in the process.

The Government can make a substantial contribution by continuing its effort to ensure that its policies are increasingly integrated so that policy does not encourage development with contradictory outcomes.

Keeping track of progress

The 'State of the Environment' reports provide a useful means to assess progress towards the ill defined goal of sustainable development. We commend this open approach and hope it will continue. We welcome the encompassing of indicators developed by Local Agenda 21 groups.

We advise that when developing indicators the Government is mindful of information hierarchies or pyramids where more local detail and objectives are accumulated to provide a national picture

There need to be some indicators that show that sustainability in UK is not being achieved on the back of unsustainable practices overseas. For example, sustainable farming could be achieved in UK but to feed ourselves we import food produced in unsustainable ways elsewhere. There should also be indicators relating to education and training.

Sustainable goods and services

The many successful government and industry led initiatives to improve environmental performance should be continued. We wish to see that the Government review encourages the use of resources for more results orientated initiatives rather than banging the 'awareness building' drum. We recognise that this will involve detailed review of success factors and more precise definition of terms and objectives. The Institution wholeheartedly supports the technocratic objective of 'Factor 4' while at the same time welcoming the realisation that sustainable development is not simply a technical issue.

However, this section avoids the question 'what level of consumption is sustainable?' It suggests economic growth can continue unhindered if it is clean and efficient.

Producers: There is much 'lip service' paid to improving environmental performance. Why else does a company like National Power only use its desulphurisation plant at Drax when it cannot achieve its emission targets in other ways? Regulation is needed, but without the commitment of

people at all levels of responsibility, environmental standards are likely to be the minimum set by regulations. We recommend that environment becomes a requirement of all professional pre- and in-service training.

Consumers: Economic growth is achieved by increasing consumption of goods and services. Sustainability is most likely to be achieved in the UK by reducing consumption.

We support the provision of simple, standardised information on all consumer products supported by a programme of consumer education. Consumers need to be able to make sense of the information they are given. For example, if they do not understand the causes and consequences of global warming, then information about CO₂ on the package would be meaningless. It goes back to providing sound environmental education in the schools. A levy could be imposed on all company advertising and promotion budgets to pay for consumer education. The information should normally be on the product with more information available on demand - perhaps on a standard sheet as is done for some health and safety information.

Recent history shows that 'green consumerism' is an important part of sustainable development as a spur to manufacturers. However, it has its limitations as experience with, for example, eco-labelling and the sale of organic produce illustrates. Concerned consumers appear to form a smaller cohort than surveys suggest and that there is a degree of hypocrisy (based on expediency) within all of us. Consequently there is scope for Government to lead consumer behaviour by regulation, infrastructure support (to overcome difficulties) and financial incentive.

It must be recognised that the British populace has a different contemporary tradition with respect to green purchasing and issues like recycling to our northern European neighbours. If consumer action is to be a principle plank en route to a more sustainable future, then Government must think of some form of 'cultural manipulation' to cater for the national character.

Building sustainable communities

In many cases the planning system is confrontational. This is a product of the process of development, and the creation of winners and losers with the winner tending to be project promoters. There is also a more ready realisation of short term benefit without an appreciation of longer term consequences.

This has been illustrated by the growth of out-of-town shopping which has contributed to the breakdown of local communities by, for example, the loss of local shops and contributing to the need for the car culture. The introduction of Planning Policy Guidance Note 13 has slowed this process although it might be argued that it is shutting the gate after the horse has bolted. There is a need for planning policy guidance to move with the times and not ten years behind.

The most sustainable patterns of development will be to foster a recognition that some activities are best centralised on large-scale production (owing to associated economies of scale, the nature of an attraction), whereas others need to be encouraged on a more local basis. The importance of the latter cannot be overstated as these types of activity which may be environmentally, culturally or economically driven mean that the need to travel is reduced and that people are more likely to come into contact. This hypothesis has been addressed extremely well by the

Geography lecturer John Adams at University College London. This will be a valuable area for Government sponsored research.

We support the Government use of the BREEAM assessment tools. Government policy should seek a means by which the construction industry can contribute to a more sustainable future. Currently, the large contracting companies need to promote large developments so that they can keep their workforce active. In reality they have little choice given the highly competitive nature of this market .

The application of market forces has meant that the development of many domestic dwellings has been contrary to the aim of sustainable development. The symptoms are:

- construction of unimaginative dwellings of poor material, with a short design life and poor resource use characteristics.
- creation of estates with limited facilities (transport, amenity, cultural etc.) contributing to a car dominated culture.
- unnecessary expansion onto greenfield sites while urban areas remain underdeveloped. New housing is clearly required, however, as a nation we appear to have missed the ideal that urban areas should be the pinnacle of human achievement rather than something which many of us wish to escape. These concepts are well discussed by a number of leading contemporary architects and urban planners.

Tourism presents fundamental challenges which are not readily addressed without controls which would not be readily accepted in our democracy. The Institution supports many of the initiatives currently being persuaded at a local level by regulatory authorities and the industry itself. These include:

- diversification of tourist interest i.e. expanding the areas of interest.
- direction of funds to protect or enhance attractions.
- attempts to reduce the number of trippers so that tourists bring more resources into the area they are visiting.
- attempts by the hotel industry to improve their environmental performance.

Managing the environment and resources

The Institution believe that there should be a long-term energy policy. It should allow the development of a market with a framework that recognises the importance of strict regulation which readily permits flexibility and innovation. It should also recognise the need for small and medium renewable energy companies to provide diversity of supply. A balance needs to be struck between benefits brought about by changes in energy policy and the merit of maintaining existing infrastructure to fulfil design life.

We support the legislation and policy being pursued by the Government and wish to see more emphasis on technological solutions and the removal of market barriers to their adoption. This might involve supporting smaller businesses which have techniques and processes for reducing emissions, further monitoring of vehicle exhausts and excluding dirty vehicles especially in urban areas.

We welcome Government action in the field of water management and wish to see more incentive for the water industry to address water management issues at the consumer end and a balanced approach to water management which decouples the direct link between building of additional water infrastructure from the profits of the water companies. This will enable a more rational approach to discharge management based on scientific understanding of risk and subsequently lead to more sustainable development which balances the environmental and financial costs of advanced waste water treatment with the benefits of the improvement obtained. A greater emphasis on maintenance will also promote more sustainable resource management.

We recognise the challenges presented by fisheries management and wish to see the Government place a greater emphasis on fisheries stocks in European fisheries negotiations. We wish to see more emphasis on the collection and interpretation of fisheries data from a national perspective.

We welcome the support of the Fisheries Stewardship Council, and would like to see more positive initiatives within the national 12 mile limit. Examples of possible actions would be an examination of methods used in scallop fishing which tend to destroy the seabed and exploring the idea of more marine reserves such as Lundy so that growing number of divers might enjoy the nation's underwater heritage.

Sending the right signals

Better information and education are required. At school level there are many materials produced for teachers to use. There is a huge number of awards to go for. There are good guidance notes from government and NGOs. However, there is little space in the existing curriculum to provide a coherent and comprehensive environmental education. We recommend that this is addressed in the next curriculum review. In further and higher education there are recommendations waiting to be implemented in the Toyne Report and its later review. These should be actively promoted and supported by DfEE. Environmental education should be an important part of the Government's life-long education strategy.

We support Government initiatives in sustainable development/environmental education and spreading of 'best practice'. We will welcome a change of emphasis toward resolution of problems based on scientific merit as well as the study of the issues themselves. This is commensurate with the aims and objectives of our Institution.