

# ENVIRONMENTAL POLICY FORUM

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## Response to the consultation into Environment Act 2021: environmental targets

### Introduction

The UK Government's vision to leave the environment in a better state than it was found poses an enormous challenge – but more importantly a massive opportunity, and one we must fully embrace to protect and restore our environment. It is for this reason that the chance to respond to the consultation into environmental targets is hugely welcome.

The targets underpinning the Environment Act have the potential to provide direction and accountability – to back up the Government's ambitious rhetoric outlined in the 25-year Environment Plan with a set of targets pioneering in scope. Notably, this means that the ambition of the targets should be in line with the need for urgent action; they should be focused to provide clarity on what is required; measurable to ensure accountability and so progress (or lack of) can be determined; and coherent, reflecting an interconnected environment where none of the key target areas: water, biodiversity, resources and waste and air quality, can or should be viewed in isolation.

Responding in collaboration as the Environmental Policy Forum, we represent a network of UK-based environmental professional bodies promoting environmental sustainability and resilience for the public benefit. With a collective membership of around 70,000 environmental professionals across a variety of different disciplines, our work runs across the scope of the environmental profession. With that in mind – and given the inherent interconnectedness of the target areas – we have grouped our comments on the proposed targets by theme sectioned below, rather than by target area. We provide specific examples where we feel this illustrates a wider comment on the strength of the proposed targets.

### 1. Ambition of the proposed targets

As noted in our introduction above, the environment targets provide a vital opportunity to drive action and must reflect the Government's ambitious rhetoric. Unfortunately, the proposed targets fall a long way short of this rhetoric.

#### *a. More ambition increases impact*

The proposed targets are underpinned by a false assumption that being less ambitious can be positive for the level of impact, focusing capacity and attention meaning the targets are more likely to be achieved. However, it is our firm belief that being more ambitious means that the

desired outcome of leaving the environment in a better state than we found it, is more achievable. This is in large part due to the interconnectedness of the environment and target areas, which means that the benefit of adopting a highly ambitious target increases the chances of achieving impact elsewhere. As just one example, the proposed target 'Reduce phosphorus loadings from treated wastewater by 80% by 2037 (against a 2020 baseline)' will have its impact reduced by relating to phosphorus only and not nitrogen. The absence of nitrogen-related targets for wastewater is justified on cost grounds, however, not only do we view this as a serious omission in isolation, it is likely that action to reduce phosphorus can also reduce other pressures.

***b. Unfounded lack of ambition***

The disparity between the ambition needed and what is seen in these proposed targets is reflected within the evidence packs across the target areas. Despite a reasonable evidence-based process being undertaken to identify appropriate levels of ambition and expert groups reporting higher levels of ambition were achievable, the final proposed target doesn't always reflect that process.

There are cases where ambitions have been lowered with at times quite limited justification, such as citing the complexities of the policy process. For example, in relation to the proposed target 'to create or restore in excess of 500,000 hectares of a range of wildlife-rich habitat outside protected sites by 2042, compared to 2022 levels': the higher target of 750,000 hectares 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. The lowering of this target's ambition to 500,000 hectares is therefore disappointing. We also argue that habitat quality should be measured when restoring habitat and creating new habitat. This could be achieved through applying Indicator D1 on Quantity, Quality and Connectivity of Habitats (currently being developed for use). In the evidence pack, this indicator is noted as not yet being ready for use, but we suggest it should be applied from the point it is refined and available (i.e., a target stating quality and connectivity will be measured from the point it is launched).

Based on the evidence packs, there are also instances where between the evidence process and target setting, it appears that key context changed but wasn't accounted for in the level of ambition. One headline example of this is in relation to the proposed target to 'increase species abundance by at least 10% by 2042, compared to 2030 levels'. The date by which this target is to be achieved was considered against a 2037 deadline initially and experts fed in on the basis of that deadline, but when the target deadline moved to 2042, there was no reflection on what that meant for the target's ambition level. This target is also limited by the choice to set 2030 as the baseline date, making 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. We feel strongly that the baseline should be set at a 2022 baseline to encourage action and accountability from now and not into the future.

### *c. Further examples to show higher ambition is required*

To further illustrate our disappointment at the level of ambition shown, we draw your attention to the following proposed targets and note why they are unambitious compared to the action required:

- Both air quality targets (concentration target and exposure reduction target) are set to be achieved by 2040. Given the severity of the issue and impact of air pollution, particular on disadvantaged communities linked to the Government's 'levelling up' agenda, 2040 is too far in the future and the deadlines for both these targets should be brought forward.
- The proposed target to 'halt the decline in species abundance by 2030' is limited. The target only measures abundance and while this was considered in the evidence pack, 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 of connectivity would also be very valuable.
- The proposed target to 'reduce the use of public water supply in England per head of population by 20% by 2037' isn't ambitious enough, as measuring by per head of population means should the population grow in the years before the target deadline, water usage could increase, and the target would still be met.
- The proposed target '70% of the designated features in the Marine Protected Area network to be in favourable condition by 2042, with the remainder in recovering condition, and additional reporting on changes in individual feature condition' 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.

## **2. Missing targets**

We are also concerned that there are several important environmental areas which aren't covered by targets – meaning these areas risk being neglected, and potentially reducing the impact that the proposed targets could have.

Some areas which we feel should be included as targets had been discussed in preliminary discussions with stakeholders, for example:

- A soil target had been discussed at earlier stage. If a soil target didn't make it into the proposed targets because of a view that it wasn't easily measurable, we would disagree with this. Even if said measurement is flawed, we otherwise risk letting 'perfect be the enemy of the good'. Ultimately, soils are a good indicator of environmental health and the absence of a soil target risks affecting the achievability of the other interlinking targets.
- A resource productivity target was also discussed with stakeholders, and this should be included alongside the (fairly under ambitious) residual waste reduction target. Including both resource productivity and waste reduction targets would be more effective as a combination and recognise the importance of going beyond waste reduction if we are to achieve a truly circular economy.

- In addition to the residual waste (excluding major minerals waste) target, we feel strongly that there should also be a target for reducing major minerals waste as well. Introducing such a target would help support the delivery of the habitat loss and biodiversity targets, as well as making a significant contribution to reducing Greenhouse gas emissions from the resources and waste sector and beyond.
- There was also prior discussion about a potential target on status 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. Should this not be a target, it is essential that goals in the 25 Year Environment Plan to address this, are made legally binding.

### 3. **Overall coherence**

We'd also like to comment on the overall coherence of the targets – including how well they interrelate and complement each other, but also whether they are consistent in nature and format.

We generally feel that the targets viewed together lack overall coherence. The reasons for this are:

- Some target areas have outcome targets while others don't. For example, there is an outcome target on species abundance but there isn't an equivalent in the resource and waste and water target areas. We feel that there should be at least one outcome, results-based target in each target area – to drive activity towards achieving that outcome target.
- There is quite a date range for achieving the targets, which is unnecessarily complex and confusing. A more consistent date structure can help to better align activities and investment, which links into our concerns over delivering the targets (see item 4.).
- Legally binding environmental targets that are already in place are proposed to remain. This risks leaving these existing targets without real leverage and doesn't help overall coherence between existing and proposed targets.
- Relating to the proposed target to 'increase tree canopy and woodland cover from 14.5% to 17.5% of total land area in England by 2050', we'd like to stress the need for careful delivery of this target by taking a 'right tree right place' approach. Tree planting without this approach in mind risks causing harm to biodiversity. Conversely, by adopting strategic spatial planning and complying with the UK Forestry Standard for genuinely sustainable, modern forestry, the tree and woodland target could be used to deliver multiple benefits and carefully planned to work towards carbon sequestration, climate adaptation (e.g., microclimate benefits) and biodiversity benefits. The same need to consider the bigger picture is true for the proposed wildlife-rich habitat target. This target neglects to include mixed/productive woodland alongside native woodland, scrub, and orchards, when if complying with the UK Forestry Standard, mixed/productive woodland can provide valuable habitat for biodiversity.

#### 4. Delivery

Beyond the proposed targets themselves, we have concerns over how they can be delivered in practice. Should we neglect to consider delivery, this risks undermining the benefits the environmental targets could have on our environment. On this aspect, we would like to emphasise the following points:

- As a network of professional bodies representing environmental professionals across sectors, we know the vital link played between expertise and delivering action. In many cases, delivering on these proposed targets will depend on having the required expertise within key workforces and disciplines. This is a concern as we know from engaging on an everyday basis with our members and wider professional networks, that there exists a major skills challenge across the environmental profession. Just some of the challenges experienced include difficulty in recruiting those with the required specialist skills or knowledge, upskilling early career professionals and ensuring there are accessible routes into their discipline for all. The extent of this skills crisis requires urgent attention if we are to achieve these targets.
- We are concerned about the funding available to ensure these targets can be delivered. This is especially concerning as funding for delivery of key programmes and policies is currently inadequate, meaning for example some Local Authorities struggle to adequately deliver measures such as Biodiversity Net Gain. There is also insufficient recognition of the reliance on citizen data to track species abundance. For the species abundance targets to have chance of being delivered, we need to ensure that this tracking of vital information is possible – with the necessary funding and support provided. Linked to this, we must address ongoing cuts in monitoring within the Environment Agency to meet targets such as the phosphorous reduction/wastewater target.
- To ensure delivery, it's important to emphasise the importance of linking the proposed targets with existing measures. For example, Environmental Land Management Schemes should be shaped to achieve the proposed target to 'reduce nitrogen, phosphorus, and sediment contribution from agriculture in the water environment by at least 40% by 2037 against a 2018 baseline.'
- Measurability is also key to delivery. One example of this is the proposed target to 'improve the England-level GB Red List Index of species extinction risk by 2042, compared to 2022 levels'. We do welcome a target on reducing extinction risk as this ensures we are maintaining a focus on the most at-risk species (as long as this doesn't replace protection for species that have lower extinction risk). However, this target offers no quantifiable target improvement and therefore lacks measurability. The evidence pack states that major achievements would only result in a small shift in the Red List Index, but this shouldn't result in removal of the measurable target.

#### Conclusion

Overall, while we welcome the introduction of new environmental targets, the proposed targets are inadequate in their current form to meet the scale of the environmental challenges in front of us. As we have outlined, the proposed targets are disappointing in their limited ambition and

overall coherence, while we have concerns about areas which aren't covered by a target, and how the targets could be delivered in practice.

We are more than happy to discuss further and illustrate our arguments with more case studies from our extensive network of environmental professionals.



[www.envpolicyforum.org.uk](http://www.envpolicyforum.org.uk)

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#### Notes

1. The Chartered Institute of Ecology and Environmental Management (CIEEM) is the leading professional membership body representing and supporting around 7,000 ecologists and environmental managers in the UK, Ireland and abroad. Our Vision is of a society which values the natural environment and recognises the contribution of professional ecologists and environmental managers to its conservation. [cieem.net](http://cieem.net)
2. The Chartered Institution of Water and Environmental Management (CIWEM), is the leading independent Chartered professional body for water and environment professionals, promoting excellence within the sector. [ciwem.org](http://ciwem.org)
3. The Chartered Institution of Wastes Management (CIWM) is the leading professional body for the resource and waste management sector representing over 5,500 individuals in the UK, Ireland and overseas. Established in 1898, CIWM is a non-profit making organisation, dedicated to the promotion of professional competence amongst waste managers. CIWM seeks to raise standards for those working in and with the sector by producing best practice guidance, developing educational and training initiatives, and providing information on key waste-related issues. It uses the body of knowledge represented by its membership to inform and influence policy and regulation on resources and waste management to increase resource efficiency and productivity and promote sustainable development. [ciwm.co.uk](http://ciwm.co.uk)

4. The Institute of Environmental Management and Assessment (IEMA) is a professional body with around 16,000 members. Our members are sustainability experts working in public and private sector roles across a wide range of industries from financial services to development and construction. Through a combination of training programmes, sharing of best practice, and thought leadership and advocacy, we work with our members to drive change in areas such as corporate sustainability, climate change and energy, the circular economy, environmental management, and impact assessment. [iema.net](http://iema.net)
5. The Institution of Environmental Sciences (IES) is a membership organisation that represents professionals from fields as diverse as air quality, land contamination and education - wherever you find environmental work underpinned by science. A visionary organisation leading debate, dissemination and promotion of environmental science and sustainability, the IES promotes an evidence-based approach to decision and policy making. [the-ies.org](http://the-ies.org)
6. The Institute of Materials, Minerals and Mining (IOM3) is a major UK engineering institution whose activities encompass the whole materials cycle, from exploration and extraction, through characterisation, processing, forming, finishing and application, to product recycling and land reuse. It exists to promote and develop all aspects of materials science and engineering, geology, mining and associated technologies, mineral and petroleum engineering, and extraction metallurgy, as a leading authority in the worldwide materials and mining community. [iom3.org](http://iom3.org)
7. The Landscape Institute (LI) is the chartered body for the landscape profession. It is an educational charity working to promote the art and science of landscape practice. The LI's aim, through the work of its members, is to protect, conserve and enhance the natural and built environment for the public benefit. The Landscape Institute provides a professional home for all landscape practitioners including landscape scientists, landscape planners, landscape architects, landscape managers and urban designers. [landscapeinstitute.org](http://landscapeinstitute.org)
8. The Society for the Environment (SocEnv) is comprised of 24 Licenced Bodies, with over 500,000 members between them. It received a Royal Charter in 2004, which empowers it to regulate the Chartered Environmentalist (CEnv) and Registered Environmental Technician (REnvTech) professional registrations globally. There are now over 7,500 environmental professionals currently registered who share a common vision of delivering sustainability through environmental professionalism. [socenv.org.uk](http://socenv.org.uk)