

**Department for Environment, Food & Rural Affairs: Consultation on
environmental targets**

Written submission of the Institution of Environmental Sciences (IES), May 2022

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The Institution of Environmental Sciences

Question 4. Would you like your response to be confidential? [Yes/No]

No

Question 5. If you answered Yes to this question, please give your reason

N/A

Target proposals for biodiversity on land

Question 6. 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]

Disagree

Question 7. [If disagree] What additional indicators do you think may be necessary?

Soil as a natural system is currently not accounted for by the proposed targets, yet it will be crucial for measuring the health of the natural environment, and for improving biodiversity in particular. Addressing biodiversity 'on land' cannot be complete without recognising that biodiversity is also linked to systems which exist 'in land', such as soil. An additional target or indicator on soil health should be included in the final combination of biodiversity targets.

Soil has a critical role as a natural system, playing three roles which are crucial to the success of the target framework: (1) buffering other natural systems against environmental harm; (2) mitigating against several interlinking natural crises, while also increasing resilience against their effects; and (3) providing additional information that can support the measurement of the health of adjacent natural systems, as well as the causes of harm to those systems.

Including an indicator of soil health in the target framework would support monitoring which could be critical to achieving the other targets, particularly on biodiversity, where the state of soil may contain information which exposes unintended consequences of policies to address other natural systems.

This crucial role is also recognised in the evidence report associated with the water targets, where the Water Target Expert Advisory Group (WEAG) acknowledges that the nutrient pollution target will be insufficient without indicators around farming practices. This corroborates the need to address soil within the targets framework, not just for the benefit of the biodiversity targets but for the benefit of the target framework as a whole.

The Institution recognises that attempts have been made to include a target on soil health during the target-setting process, and that a significant reason the target was excluded was the difficulty in identifying a single indicator to use. However, there are two main reasons why this ought not be a reason to preclude a target or indicator on soil health.

Firstly, excluding potential target areas or reducing ambitions in order to prioritise the potential to achieve other targets is premised on a false logic which does not fully recognise the interlinking natural systems involved. Excluding a critical natural system from the target framework will not create capacity to address other target areas; it will impede progress towards all target areas relating to natural systems which interlink with the excluded system.

To that end, failing to set targets on critical systems is likely to have a larger negative impact on the overall achievement of targets than any small benefit to capacity from lowering ambitions or shifting focus away from those core systems.

Secondly, the difficulty selecting a 'perfect' target to represent the health of a critical natural system should not justify the total exclusion of any target set in that area. This approach is reflected elsewhere in the proposed target framework, where targets are used to indicate the health or success of an element of the natural environment, or used as proxies for another aspect of the environment.

For example, the biodiversity terrestrial and freshwater targets evidence report identifies the target on wildlife-rich habitat restoration and creation as "*an action-based indicator ... as a proxy for habitat condition.*" Similarly, an action-based indicator, aligned with concurrent commitments expected in the Soil Health Action Plan for England (SHAPE) could be a suitable indicator to support monitoring and improvement for soil health. Sustainable management of soils could provide the basis of a suitable target, although the urgency of sustainable land management may require a faster time frame than the long-term targets framework. As previously noted, in the evidence report associated with the water targets, the WEAG acknowledges the benefits of such an indicator to the wider target framework.

Whilst it is correct that soils are highly contextual and that different soil types or different roles in an ecosystem associated with soil may be reliant on indicators to differing extents, there are a number of potential indicators that could be utilised to make assessments of soil health, either as proxies or as indicators which are likely to demonstrate a particularly important ecosystem service is being protected, such as using organic matter, microbial diversity, or geo-chemical health as proxies supported by specific biological and geo-chemical metrics.

Even though it is unlikely that a single indicator could be produced to make a comprehensive assessment of the exact state of soil health across contexts within the remaining timeframe of the target-setting process, that ought not be a justification to exclude an indicator which could effectively measure aspects of soil health to some extent.

2030 and long-term species abundance targets

Question 8. 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]

Disagree

Question 9. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

The proposed target on species abundance is a positive starting point, however does not currently go far enough to achieve the level of ambition necessary to secure environmental improvement in this area. In particular, the current target does not account for the full consequences of natural systems and the state of habitats on species abundance. The proposed target is currently unlikely to drive action beyond the minimum level necessary to acknowledge existing international commitments, such as the Aichi Biodiversity Targets.

Firstly, the proposed target does not reflect the necessary urgency to address biodiversity loss. There is already extensive evidence of the environmental and social harms associated with biodiversity loss, which is acknowledged in the consultation document. The JNCC Nature Positive 2030 Summary Report highlighted that “*nature loss harms human health and well-being and undermines our economy*”, echoing the conclusions of the Dasgupta Review on the Economics of Biodiversity.

Whilst it will understandably be challenging for the UK to be nature-positive by 2030, that is not a sufficient justification for setting minimal ambitions for increasing species abundance after that date. The JNCC’s Nature Positive 2030 Evidence Report concludes that “*the UK can become Nature Positive by 2030, provided we act now, and that investing to become Nature Positive will deliver many benefits to people and our longer-term economic prosperity.*”

However, the evidence report associated with this target acknowledges that “*the level of improvement necessary to halt the decline by 2030 would result in a 2042 index value similar to 2022 and be roughly equivalent to a 10% increase on the 2030 value.*” If the extent of ambition under the target is to end with the same state of species abundance as currently exists in 2022, the target will have failed to meaningfully improve the state of the natural environment.

Setting the baseline for the target at 2030 also poses the potential for unintended policy consequences with regards to halting the decline of species abundance. If the baseline for improvement is set against 2030, it may appear desirable to forego the possibility of halting the decline earlier than that to reduce the baseline for increasing abundance by 2042, thus improving the likelihood that both targets are met, rather than seeking the maximal possibility for improving species abundance.

The proposed target would be significantly improved by either setting a more immediate baseline for improvement in order to reflect the urgency of addressing biodiversity loss, or through a more ambitious target for increasing species abundance against a 2030 baseline.

The evidence report associated with this target identifies three scenarios for improvement which were initially considered against a 15-year target, with 30% as a higher ambition scenario, 15% as a medium ambition scenario, and halting biodiversity loss as the lowest ambition scenario. In this context, the expert assessment of feasibility stakeholder questionnaire identifies that 6 of 13 experts had medium, high, or full confidence in achieving the medium ambition scenario, with only 1 stating they had no confidence in achieving that scenario by 2037.

Furthermore, as noted in the evidence report, *“at the end of the workshop participants were asked to mark a spot on a sliding scale from below the low ambition to above the high ambition suggesting what level the target should be set ... with the majority falling somewhere between medium and high.”* Despite this, even with a 2042 target date rather than 2037 (as well as a 2022 baseline), the proposed target has been set significantly below the medium ambition scenario.

On the basis of the evidence provided in the evidence report, the ambition for this proposed target should be at a minimum to increase species abundance by 15% against a 2030 baseline, or preferably against a 2022 baseline.

Long-term species extinction risk target

Question 10. 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]

Disagree

Question 11. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

While it is important to address species extinction risk within the target framework, the proposed target may not be sufficient to achieve an ambitious level of change. Indications from the evidence report associated with this target identify the understandable concerns about the feasibility of large scale reductions in extinction risk without significant changes to our society's approach to nature. However, that level of transformative change will be necessary to achieve the biodiversity targets in general, particularly in the context of an ecological emergency which requires urgent action.

The proposed target may lead to unintended consequences, such as the prioritisation of certain species or atomistic approaches to individual species at the expense of habitats and avoiding the decline of nature elsewhere. It is especially important that the target is coherent with the wider set of biodiversity targets, including existing commitments such as the Aichi Biodiversity Targets.

The evidence report identifies that expert views on the scale of action needed to meet the medium ambition scenario would require "*greater focus on integrating environment and biodiversity into decision-making by all parts of government ... change to the approach to land management. ... including dedicating large areas of land to nature and focussing on creating naturally functioning ecosystems ... The types of changes required would impact society as a whole*". While this level of action would require a significant change in existing policy, as well as behavioural changes throughout society, it is reflective of the overall scale of transformative change required to address the interlinking environmental crises threatening society.

Therefore, the requirement of significant action to produce meaningful change should not preclude an ambitious target in this area, given the high consequences of failing to act and the extensive potential for co-benefits across the biodiversity target areas. Particularly given that many of the other proposed targets will similarly rely on changes to policies affecting land management, nature-based land use, and cross-governmental approaches to nature, the feasibility of this target should not be considered in isolation when setting ambition.

While there are significant barriers to feasibility identified in the evidence report associated with this target, it would still be more appropriate to set the ambition of this target above the lowest ambition scenario identified in the notional targets. Therefore, it would be preferable to set a target that seeks to not only improve the Red List Index or halt decline,

but also to reduce the number of threatened species. Even if DEFRA believes that the medium ambition notional target of 7.5% is be too high to achieve, a smaller target for reducing threatened species may be feasible while still setting meaningful ambitions.

Long-term wider habitats target

Question 12. 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]

Disagree

Question 13. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

The proposed target on habitats should be set to create a net increase in habitats, rather than solely focusing on creating or restoring habitat. The proposed target currently creates the possibility that existing wildlife-rich habitats could experience significant decline without affecting the success of the target, which could lead to improper prioritisation of policy approaches. In order to drive coherent environmental improvement across the country, the target should ensure that creating and restoring wildlife-rich habitat is increasing those habitats in net terms. This concern is recognised elsewhere in the target framework, including in the rationale for the selection of the woodland cover target.

The evidence report associated with this target raises feasibility challenges with an ‘outcome-based’ target, noting that “*no comprehensive spatial dataset is available to measure loss of habitat or identify the location of action to increase the extent of new habitat through either restoration or creation.*” However, the risk of losing wildlife-rich habitats is significant enough that some level of precaution should be taken to reflect this, regardless of the current availability of datasets.

Options are considered to address this gap in the evidence report, including the forthcoming Natural Capital and Ecosystem Assessment programme’s outcome indicator D1 on habitat quantity, quality and connectivity. While there may currently be challenges for data collection, this should not preclude the target accounting for habitat loss entirely. Although the 2030 baseline target for species abundance was not fully appropriate, it would be possible to set a baseline for this proposed target in the next few years once an appropriate indicator of habitat loss exists.

Alternatively, if it is DEFRA’s view that it will never be possible to adequately set a target that achieves net increase in wildlife-rich habitats, the potential for habitat loss should be accounted for as a risk in the level of ambition set for creating or restoring habitats, to ensure that the necessary level of environmental improvement is properly reflected. To that end, considerations of the ambition in the proposed target should favour higher ambition where possible.

In terms of the scale of ambition represented by 500,000 hectares, the proposed target is also insufficient. The evidence report associated with the target identifies that the expert workshop indicated that 69% of respondents “*thought the level of ambition should be set at*

750,000ha". While this level of ambition would exceed the scenarios presented in the evidence report, those scenarios also considerably exceed the proposed target.

The evidence report justifies the lower level of ambition with reference to the deliverability of policies associated with the scenarios for higher ambition. However, Scenario 2 presented in the evidence report would result in an estimated total of 566,340 ha, accounting for Biodiversity Net Gain, the Peat Action Plan, Woodland Planting, and delivery by partners. The majority of these have already seen commitments at the policy level, and setting the proposed target at a lower level of ambition than existing commitments demonstrates a lack of coherence across government policy.

Furthermore, Scenario 4 accounts for the role of the Sustainable Farming Incentive, and the evidence report states that "*at the time of the analysis the Environmental Land Management (ELM) agri-environment scheme proposed to deliver up to 325,000 ha of habitat outside of protected sites by 2042.*" While it may be prudent not to assume the full level of delivery of ELM schemes in increasing wildlife-rich habitat, it may be feasible to achieve at least some level of ambition between Scenario 2 and Scenario 4.

Given that a majority of the expert stakeholders involved in the workshop thought the level of ambition should be set at 750,000 ha, the level of risk associated with the feasibility of delivering more than 500,000 ha appears to have been significantly overemphasised. The level of ambition in the proposed target should be significantly increased, to at least the 609,660 ha estimated to be achievable under Scenario 3. In light of the view of the expert stakeholders, the high ambition target of 750,000 ha could also be an appropriate and feasible option.

Question 14. Do you agree or disagree that all wildlife-rich habitat types should count towards the target? [Agree/Disagree/Don't know]

Agree

Question 15. [If disagree/Don't know] 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]]

N/A

Question 16. What reasons can you provide for why these habitats should not count towards the target?

N/A

Target proposals for biodiversity in the sea

Question 17. Do you agree or disagree with the level of ambition proposed for the Marine Protected Area target? [Agree/Disagree/Don't know]

Disagree

Question 18. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

The proposed target on Marine Protected Areas (MPAs) is largely positive, but would benefit from a slightly greater degree of ambition. The evidence report on the biodiversity marine target demonstrates a strong evidence base for the development of the target, with a commendable degree of scientific insight. Despite this, there is a degree to which the avoidance of risks relating to the feasibility of achieving the target have been prioritised over avoiding risks to the state of the marine environment.

It would defeat the purpose of the target setting process to only set targets at a level of ambition where there is a low risk that they will not be met. The target framework should promote significant environmental improvements and drive policy change which improves the environment in ways which would not otherwise have occurred. To that end, accepting a low to medium risk that a target may not be met without suitable policy change is not unreasonable.

The evidence report identifies a low risk of overestimating recovery potential with a target for 71% of the designated features in the MPA network to be in favourable condition, yet the proposed target is set lower than that level of ambition. Even at 79% of designated features, the possibility of overestimating recovery potential is only considered to be a 'medium' risk. Setting ambitions between the low risk scenario and the medium risk scenario would be more appropriate than the proposed target, so a target at approximately 75% of designated features may be a suitable alternative.

Abandoned Metal Mines

Question 19. Do you agree or disagree with the level of ambition proposed for an abandoned metal mines target? [Agree/Disagree/Don't know]

Disagree

Question 20. [If disagree] What reasons can you provide for why government should consider a different level of ambition?

The proposed target on abandoned metal mines has a very specific focus and relevance, which raises a number of questions about the coherence and prioritisation of the target framework as a whole. Given that decisions on including or excluding targets have been made in the context of the feasibility and cost of achieving the proposed targets as a whole, it seems improper to prioritise issues addressing geographically-limited issues at the expense of targets which address critical natural systems across the country.

Setting aside the question of whether a national long-term target in this area is more appropriate than other potential targets, the ambition could also be increased. Although the consultation paper predicts that meeting the 50% target would require 40 new schemes, it recognises that these are likely to be significantly clustered in geographic regions. This suggests that a higher level of ambition should be feasible within the 15-year period of the target.

The consultation paper and associated evidence report do not sufficiently clarify whether the 50% reduction refers to the total removal of pollutants from 50% of the targeted length of rivers (which is implied by the consultation paper), or whether an overall reduction of 50% of pollutants across the entire targeted length of rivers would also meet the requirements of the target. The latter would also demonstrate insufficient ambition, as it could encourage a narrow focus that leaves a significant proportion of relevant river environments significantly polluted.

Regardless, if this target area continues to be prioritised in the final target framework, the level of reduction should be significantly increased to reflect a higher ambition scenario, given the geographical synergies which are likely to arise.

Nutrient Pollution

Question 21. 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]

Agree

Question 22. [If disagree] Why don't you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target?

N/A

Question 23. [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?

As long as they are additive, rather than replacing any measure or resource linked to the proposed target, an additional set of ambitions linked to reducing pollution in individual catchments should be expected to strengthen the national target.

While much of the action needed to address agricultural nutrient pollution will be targeted by policy drivers at the national level, including through ELMS and the Sustainable Farming Incentive, there remain two advantages to also setting catchment-scale targets.

Firstly, there are inherent benefits to addressing river pollution at the catchment scale, particularly when considering pollution from adjacent areas of land. Different catchments will face different subjective issues, as they have different types of soil, different contextual history, and different geography. To that end, setting additional targets at the catchment scale will support national environmental improvement, rather than an approach which only addresses the majority of areas, or the easiest challenges to mitigate.

Secondly, there are specific pollution events linked to the catchment scale which demand a response to drive environmental improvement, but which may be de-prioritised in pursuit of a national target if they are deemed to be too politically-difficult to address. For example, the current situation with the River Wye catchment area has led to significant nutrient pollution linked to agricultural drivers, and would benefit from a legally-binding catchment scale target to drive action which addresses it directly.

Particularly 'high profile' incidents of nutrient pollution are already likely to receive a targeted response, though it is not reasonable to expect that all catchments will receive the same level of focus where high levels of pollution are experienced. Catchment level targets would 'double-lock' against any particularly harmful events, while potentially also supporting work towards the national target.

Nutrient pollution from wastewater

Question 24. 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]

Disagree

Question 25. [If disagree] What reasons can you provide for why the target doesn't give this flexibility?

While the proposed target provides flexibility of choice, it is not sufficiently clear that steps have been taken, either through the target framework or separately, to ensure that water companies will be empowered with sufficient knowledge to make decisions about which strategies to employ, particularly in terms of using nature-based solutions.

It is not sufficient for water companies to have choice, they must be able to make evidence-informed choices. Currently, there are not sufficient policy drivers to ensure widespread utilisation of the best options.

Question 26. Do you agree or disagree with the level of ambition proposed for the nutrient targets? [Agree/Disagree/Don't know]

Disagree

Question 27. [If disagree] What reasons can you provide for why government should consider a different level of ambition?

The proposed target on agricultural nutrient pollution does not currently present a level of ambition which is reflective of the aspirations associated with the policy drivers underpinning it. In DEFRA's Agricultural Transition Plan 2021 to 2024, the Secretary of State described upcoming policies as "*the biggest change in agricultural policy in half a century*" and stated that "*we have a chance to do things differently, we should think through from first principles what a coherent policy actually looks like*".

In the context of the ambition for a 'step change' in agriculture which seeks to transform agricultural systems, a significantly greater level of ambition should be possible. By the end of the timeframe associated with the nutrient pollution targets, it is expected that the primary policy drivers of the agricultural transition, particularly ELM schemes, should have been in place for a significant amount of time. If those measures are to meet the ambitions set for them, a higher level of ambition than a 40% reduction in nutrient pollution from agriculture should be achievable.

If these policy drivers affecting agriculture are going to meaningfully address the extent of nutrient pollution, a high level of ambition will be necessary to ensure that nutrient pollution is not de-prioritised in future land management.

The evidence report associated with the nutrient pollution targets notes that the Water Target Expert Advisory Group (WEAG) “*suggested that the proposed target does focus on the right point of the logic chain but ... that other indicators of progress may be required alongside load estimates, e.g. indicators measuring uptake of farming practices.*” The WEAG also notes that “*experts agreed overall that the proposed metric ... is a slow-moving metric and will need to be supplemented with other metrics behind the scenes in order to assess the progress in the short to medium term.*”

This acknowledges that the success of the nutrient pollution target in agriculture will be intrinsically linked to the delivery of policy objectives in agriculture. Given these have already been assumed in other policy documents, a lower level of ambition than their full delivery should not set under the target framework. It is not sufficient to set a slow or incremental level of ambition when policy change is expected imminently at a large scale.

Additionally, the proposed target on wastewater nutrient pollution should explicitly include nitrogen. The consultation paper states that “*[DEFRA] previously considered including nitrogen reduction ... but without further research into the links between elevated nitrogen levels and eutrophic impacts in rivers, the target might require very high-cost nitrogen removal from wastewater treatment work for highly uncertain environmental benefits.*”

This statement, that a lack of evidence of the extent of harm caused by nitrogen as a pollutant was the rationale for precluding action to address it, directly contradicts the precautionary principle. The need for further research into the extent of harm should not be a reason for inaction to address environmental degradation. While the high costs of action should be a relevant question in the feasibility and ambition set against a target on nitrogen pollution from wastewater, they should not be reasons to avoid a target altogether.

Currently, there is also a question of coherence between the proposed nutrient pollution targets and existing commitments and targets, particularly under the Water Framework Directive. It is unclear how the operational level will function, particularly where key bodies are already facing heavily restricted capacity and resourcing. Given the political weight placed on this target framework, further clarity is needed on how the pursuit of existing targets will function, and whether or not the same weight will be given to meeting them.

There is not currently sufficient evidence of plans for governance and operational activities to ensure coherence with existing targets and commitments. While this is potentially an inevitable issue which affects the entire target framework, it is especially important in the context of the nutrient pollution targets.

Measuring the state of a wider range of pollutants will be critical for awareness of emerging threats, for ensuring that interventions are truly making progress towards improvement goals, and to provide more contextual data on whether interventions are fully achieving ambitions.



In the absence of a soil health target or sufficient proof of coherence with SHAPE and other measures to address agriculture, this will be especially important in the agricultural context.

Water Demand

Question 28. Do you agree or disagree with the level of ambition proposed for a water demand target? [Agree/Disagree/Don't know]

Disagree

Question 29. [If disagree] What reasons can you provide for why government should consider a different level of ambition?

The level of ambition in the proposed water demand target is not coherent with existing commitments, including those made by water companies, which are already expected to have a significant effect on water demand per capita. While commitments made by water companies are not subject to the same legally-binding conditions of the target framework, it is not sufficient to set ambitions at merely holding companies to account for their commitments. In order to improve the health of water systems, the proposed target should set ambitions significantly higher.

The consultation paper already identifies the performance target for companies to deliver a 50% reduction in leakage from 2017/18 levels by 2050, and the measures announced in 2021 by the Secretary of State to “*support the delivery the ambitions set out in the National Framework to reduce personal water consumption to 110 litres per person per day by 2050*”. However, the level of ambition set under the target only accounts for a 31.3% reduction in leakage and a reduction to a consumption level of 122 litres per person per day by 2037. While these are likely to align with the existing ambitions by 2050, they are not sufficient to exceed existing commitments.

This corresponds with the evidence report associated with this target, which states that the WEAG “*highlighted that current water company plans aim to achieve a national average PCC per day of about 118 l/p/d by 2050*” and “*suggested setting a higher level of ambition in the Environment Act 2021 for water demand, ... to drive more ambitious policy and action*”.

In the context of the increasing risk of water scarcity associated with climate change and other environmental factors, the level of ambition in the proposed target is especially important, and should be set at a level which appropriately increases resilience against that risk. As new evidence emerges of the importance of water security, ambitions should rise to meet the scale of increasing challenges. The report of IPCC Working Group II on Impacts, Adaptation and Vulnerability provides significantly greater evidence of the need to address water demand.

The proposed target does not currently reflect a commensurate increase in ambitions to meet the scale of action required.

Target proposals for woodland cover

Question 30. Do you agree or disagree with the proposed metric for a tree and woodland cover target? [Agree/Disagree/Don't know]

Disagree

Question 31. 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]

Agree

Question 32. 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]

Agree

Question 33. Do you agree or disagree with our proposed level of ambition for a tree and woodland cover target? [Agree/Disagree/Don't know]

Disagree

Question 34. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

The proposed target on woodland cover is largely positive, but would benefit from a slightly greater degree of ambition. The proposed target slightly overemphasises the importance of policy flexibility in the feasibility of achieving the target, at the expense of the potential for environmental improvement. Currently, as acknowledged in the evidence report associated with this target, the proposed target does not meet the level of ambition recommended by the CCC in its balanced net zero pathway.

In the rationale for setting the level of ambition at 17.5% woodland cover, the evidence report cites the need for policy flexibility, the potential for future technology to provide alternative pathways, and the risk associated with relying on increased agro-forestry. Even though an increase in agro-forestry consistent with the 19% woodland cover scenario may be highly challenging, it would be unreasonable to completely undervalue the potential for a significant degree of increased agro-forestry, primarily driven through the Sustainable Farming Incentive. This suggests that a level of ambition between the 17.5% scenario and the 19% scenario would be feasible without creating a significant risk of negative environmental consequences.

Additionally, the proposed metric currently does not take sufficient steps to ensure a positive composition of woodlands and to avoid the risks of monoculture planting in certain contexts. Reliance on measures in the England Trees Plan and UKFS to drive mixed woodland creation is insufficient.

More should be done to clarify that this target's scope is not intended to include significant amounts of those introduced species such as Rhododendron which can have adverse effects on biodiversity. Potential solutions would range from acknowledging this as a 'native species tree and woodland target' to a more explicit metric for the target.

Alternatively, if DEFRA's view is that it will not be possible to adequately include these considerations in a coherent metric, the associated risks should be accounted for in the level of ambition set, to ensure that the necessary level of environmental improvement is properly reflected. To that end, considerations of the ambition in the proposed target should favour higher ambition where possible.

Target proposals for resource efficiency and waste reduction

Question 35. 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]

Disagree

Question 36. [If disagree] What reasons can you provide for why the government should consider a different target scope?

It is desirable to ensure that the target on residual waste is clear and drives appropriate action to address widespread causes of residual waste, and it is positive that the evidence report associated with this target recognises “*the importance of reducing the residual treatment of other materials, which are lighter in weight, but nonetheless have significant environmental impacts*”.

However, there is still a significant degree of environmental harm associated with major mineral wastes, particularly concrete, sand, and soils entering landfill from construction, and it would be insufficient to exclude them from the target framework entirely. Failing to address the harm associated with major mineral wastes, particularly from construction and demolition, is incoherent with previous government policy commitments to the circular economy. Material treatment and re-use should be promoted over disposal in keeping with the waste mitigation hierarchy, and it would be inappropriate to exclude those considerations from the target framework.

The rationale for excluding major mineral wastes in the evidence report states that “*the data for some areas of waste is currently less robust than others*”. As previously stated, the need for further data associated with the extent of harm should not be a reason for inaction to address environmental degradation. While the high costs of action should be a relevant question in the feasibility and ambition set against a target on major mineral wastes, they should not be reasons to avoid including those wastes in a target altogether.

If DEFRA believes that it would be inappropriate to combine major mineral wastes to ensure the clarity and focus of the proposed residual waste target, then major mineral wastes should be addressed separately in an additional target.

Proposed metric for reducing residual waste

Question 37. Do you agree or disagree that our proposed method of measuring the target metric is appropriate? [Agree/Disagree/Don't know]

Agree

Question 38. [If disagree] What reasons or potential unintended consequences can you provide or foresee for why the government should consider a different method?

While the IES agrees with the proposed method of measuring the target metric, this should be read in the context of the Institution's other responses, particularly to Question 35 and Question 36 above on the exclusion of major mineral wastes.

Question 39. 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]

Agree

Question 40. Do you agree or disagree with the level of ambition proposed for a waste reduction target? [Agree/Disagree/Don't know]

Disagree

Question 41. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

The proposed target on waste reduction is currently not ambitious enough to drive environmental improvement linked to resource use. To be most effective, the target framework would benefit from a 'double lock' on resources, measuring both residual waste as well as the efficiency of resources. Operating in isolation, a target on residual waste is unlikely to ever be ambitious enough to fully influence the systems of consumption and production which drive inefficient resource usage.

An additional target on resource efficiency is therefore necessary. Without a current proposal for a resource productivity target, it is not possible to fully consider whether or not the proposed waste reduction target is ambitious enough.

Depending on the level of ambition associated with that target, and on whether or not a resource productivity target is included in the final target framework, a higher level of ambition may be necessary for the waste reduction target, to account for the potential risk that focusing solely on waste reduction will not drive systems level change.

Resource productivity

Question 42. Do you agree or disagree with our proposed metric for considering resource productivity? [Agree/Disagree/Don't know]

Agree

Question 43. [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?

N/A

Question 44. 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.

The consultation paper does not provide sufficient information to make a full evaluation of the listed policies and how best to implement them. Without the additional information on these approaches expected in the second Waste Prevention Programme, there is limited scope to provide a detailed evaluation.

The consultation paper lists the following policies: “*reforms to, and the introduction of, extended producer responsibility schemes, the necessary powers to introduce eco-design measures on non-energy related products and requirements for the mandatory provision of consumer information*” and “*further possible policy instruments ... regulatory, information-based, price-based, as well as possible spend interventions*”. As a general observation, an effective implementation of these policies could support the achievement of a resource productivity target.

Selecting between national and regional implementation of targets will be most effective when it is targeted at the scale of the system of consumption or production which is being targeted by the policy.



Target proposals for air quality

Question 45. Do you agree or disagree with the level of ambition proposed for a PM2.5 concentration target? [Agree/Disagree/Don't know]

Disagree

Question 46. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

The Institution's sister organisation, the Institute of Air Quality Management (IAQM), will submit its own response to this consultation, which will provide full reasoning for an alternate level of ambition. The IES strongly recommends reading this authoritative response, which aligns with the Institution's own perspective.

Question 47. Do you agree or disagree with the level of ambition proposed for a population exposure reduction target? [Agree/Disagree/Don't know]

Disagree

Question 48. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

The Institution's sister organisation, the Institute of Air Quality Management (IAQM), will submit its own response to this consultation, which will provide full reasoning for an alternate level of ambition. The IES strongly recommends reading this authoritative response, which aligns with the Institution's own perspective.