

The Prime Minister
Rt Hon Liz Truss MP
10 Downing Street
London SW1A 2AA

3 October 2022

Environmental regulations

Dear Prime Minister

Your government's recent moves toward environmental deregulation will hasten the decline of our natural world.

Together, *The Retained EU Law (Revocation and Reform) Bill* and *Planning and Infrastructure Bill* proposals to weaken planning protection could put paid to the chances of meeting legally-binding climate and nature targets, create uncertainty for vulnerable businesses, shatter the long-term sustainability of our economy, and unleash environmental losses that could reduce quality of life for millions of people. Coupled with a potential rowing back on the Agricultural Transition, they also mark a radical departure from the manifesto commitment to "the most ambitious environmental programme on Earth" under which the Conservative government was elected.

Laws that protect the bedrock of our environment—air and water quality, soil health, heritage, and wildlife—must not be weakened. Doing so could hasten the torrent of pollution that blights our rivers and streams and increase the damaging presence of pesticides across a range of habitats. It could lead to losses of green spaces and heritage assets that are precious to communities and important for people's mental health and wellbeing. It could further pollute the air we breathe, with consequences for public health and the costs to the NHS. Of course, the consequences for wildlife could mean that species and habitats are lost from our shores. Animal welfare regulations that ensure better quality of life for millions of farm and companion animals are also at risk, and with them the UK's reputation as a welfare world leader.

The argument that these laws impose unnecessary burdens on business, as suggested in the growth plan announced on 23.09.22, is unfounded and short-sighted, based on an old-fashioned view of business needs. Progressive businesses in key growth industries understand that a healthy environment is a prerequisite of a healthy economy, that their customers want to see them working to advance the protection of the environment and that nature recovery and decarbonisation are market opportunities. As the Treasury's *Dasgupta Review on the Economics of Biodiversity* conclusively demonstrated, economic security depends on environmental security and any growth agenda that does not include sustainable management of nature will be unsuccessful.

The removal of regulations and the review of other environmental policies, without a clear plan for what will replace them, is extremely disruptive to businesses and communities and could not come at a worse time. Laws like the Habitats Regulations are not some useless legacy of European law—they are among our most effective conservation laws. Changing the rules would create years of delay and uncertainty at a time when stability and environmental action are needed most. Any sense that costs would be saved is an illusion. The costs of environmental damage would be multiplied and simply shifted to the communities who suffer the consequences.

The Retained EU Law (Revocation and Reform) Bill sets an unreasonable and unnecessary timeline for removal of EU-retained laws. DEFRA is responsible for hundreds of retained laws that remain essential for our environment. Removal when there is no clear plan or mandate for an alternative could set back environmental delivery by years. The Government should be focused on implementing them better and investing in our environment. DEFRA's EU-retained environmental laws should not be part of this process of mass deregulation.

Planning and Infrastructure Bill proposals to weaken environmental planning rules in "Investment Zones" around the country would be similarly misconceived. The Habitats Regulations protect precious natural habitats and our most vulnerable wildlife. Simply stripping away the rules would not solve problems like the chronic pollution of our rivers; it would be a smokescreen for continued environmental harm. Rather than weaken environmental rules, environmental recovery, environmental monitoring and investment in natural infrastructure should be key tenets of any proposed investment zones.

While reasonable and positive reform can be achieved, it has to be based on careful consideration, grounded in evidence and consultation. Change for change's sake is not a public priority. Support for existing UK environmental standards and protections is resolutely high in constituencies up and down the country, so any changes must be based on clear proposals for change and evidence of what that will deliver. It is particularly concerning to see the un-evidenced push for environmental deregulation accompanied by suggestions that the Government could weaken Environmental Land Management scheme, despite clear evidence that this sustainable approach will deliver for farmers, the public and for nature and climate.

On behalf of the millions of people who care for and depend on our natural world, we hope you will step away from deregulation, and the attack on nature it would constitute. There is an opportunity to instead focus on achieving huge benefits for our economy, for communities and the Government's green legacy, by delivering on great green goals.

This Government has made some bold and impressive environmental promises. We applaud the aim of passing on nature in better condition. Our hopes for the future are raised by the legal target to halt the decline of wildlife by 2030. We were delighted to hear your pledge to lead a delegation to global COP-15 nature talks in Montreal, where the UK can play a leading diplomatic role. We all support the target to achieve net zero. These goals are all jeopardised by a deregulatory agenda

It would be totally inconsistent to set world-leading targets, while sweeping away the regulations needed to achieve them.

Yours sincerely,

Beccy Speight, CEO, Royal Society for the Protection of Birds (RSPB)
Hilary McGrady, Director General, National Trust
Craig Bennett, CEO, The Wildlife Trusts
Abi Bunker, Director of Conservation & External Affairs, The Woodland Trust
Tanya Steele, CEO, World Wide Fund for Nature (WWF) UK
Miriam Turner and Hugh Knowles, Co-CEOs, Friends of the Earth (England, Wales and Northern Ireland)
Sarah Fowler, CEO, Wildfowl & Wetlands Trust (WWT)
Sarah McMonagle, Acting Director of Campaigns & Policy, CPRE The Countryside Charity
Laura Clarke OBE, CEO, Client Earth
Mark Lloyd, CEO, The Rivers Trust
Sandy Luk, CEO, Marine Conservation Society
Pat Venditti, Interim Executive Director, Greenpeace UK
Hugo Tagholm, CEO, Surfers Against Sewage
Allison Ogden-Newton, CEO, Keep Britain Tidy
David Bowles, Head of Public Affairs & Campaigns, RSPCA
Neil Redfern, Executive Director, Council for British Archaeology
Tompion Platt, Director of Operations & Advocacy, The Ramblers
Darren York, CEO, The Conservation Volunteers
James Blake, CEO, Youth Hostel Association (England & Wales)
Rebecca Wrigley, CEO, Rewilding Britain
Nick Measham, CEO, Wildfish
Andy Knott MBE, CEO, League Against Cruel Sports
Paul Davies, CEO, British Mountaineering Council
Andy Atkins, CEO, A Rocha UK
Dr Tony Gent, CEO, Amphibian and Reptile Conservation
Andy Bool, CEO, Mammal Society
Rose O'Neill, CEO, Campaign for National Parks
Gill Perkins, CEO, Bumblebee Conservation Trust
Kate Ashbrook, General Secretary, Open Spaces Society
Steve Andrews, CEO Earthwatch Europe
Kit Stoner, CEO, Bat Conservation Trust
Matt Shardlow, CEO, Buglife
Julie Williams, CEO, Butterfly Conservation
Dr Hazel Norman, CEO, British Ecological Society
Dr Richard Handley, President, Chartered Institute of Ecology and Environmental Management (CIEEM)
Stuart Singleton-White, Head of Campaigns, Angling Trust
Professor Jeremy Biggs, CEO, Freshwater Habitats Trust
Sonul Badiani-Hammett, Director, FOUR PAWS UK
Ian Dunn, CEO, Plantlife
Jill Nelson, CEO, Peoples Trust for Endangered Species
Dr Andrew Terry, Director of Conservation and Policy, The Zoological Society of London (ZSL)
Mike Daniels, Head of Policy, John Muir Trust

Chris Butler-Stroud, CEO, Whale & Dolphin Conservation
Dr Ruth Tingay, Co-Director, Wild Justice
Peter Hambly, Executive Director, Badger Trust
Dr Michael Warhurst, Executive Director, CHEM Trust
David Bunt, CEO, Institute of Fisheries Management
Dr Mark Jones, Head of Policy, Born Free
Tom Hunt, National Coordinator, Association of Local Environmental Records Centres (ALERC)
Ali Hood, Director of Conservation, Shark Trust
Martin Janes, Managing Director, River Restoration Centre
Rosalind Forbes-Adam, Founder, Woodmeadow Trust
Dave Morris, Chair, National Federation of Parks and Green Spaces
Sue James, Convenor, Trees and Design Action Group
Rachel Thompson MBE, The Trails Trust
Terry Fuller, CEO, The Chartered Institution of Water and Environmental Management
Matthew Morgan, Director, Quality of Life Foundation
Graham Duxbury, CEO, Groundwork UK
Liz Milne, Chair, Association of Local Government Ecologists
Helen Griffiths, CEO, Fields in Trust
Sonia Kundu, Chairperson, Rail to Trail
Jayne Manley, CEO, Earth Trust
Dr Jo Judge, CEO, British and Irish Association of Zoos and Aquariums
Jamie Christon, CEO, Chester Zoo
Charles Watson, Founder and Chairman, River Action
Jamie Agombar, Executive Director, Students Organising for Sustainability (SOS-UK)
Jonathan Baillie, Chief Strategy Officer, On the Edge
Sue Morgan, CEO, Landscape Institute
Robin Nicholson, CBE, Convenor, The Edge
Mark Rowland, CEO, Mental Health Foundation
James Alexander, Chair, Finance Earth
Antoine Argouges, Founder & CEO, Tulipshare
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Dr Richard Benwell, CEO, Wildlife & Countryside Link