

Response to EFRA Select Committee stakeholder survey

1. What major unresolved policy challenges are you or your stakeholders facing?

The Government is committed to the target set under the Environment Act to halt the decline in nature by 2030. This makes Defra the responsible department for overcoming the ecological crisis that threatens the wellbeing, health and security of all. This task is the major policy challenge facing Defra. Major obstacles blocking the path to 2030 target achievement include:

A stuttering farming transition: Over 70% of the UK is farmed, making the success of the post-Brexit transition to a farming support model based on rewards for the provision of environmental goods critical to the achievement of the 2030 nature recovery target. As of November 2024 that transition is struggling, with the overall farming budget frozen at a level less than half that calculated as the minimum required for achieving nature recovery. Within the budget, the majority of funds are still earmarked for the most environmentally unambitious Environmental Land Management (ELM) scheme, the Sustainable Farming Incentive, with new rounds for the two more ambitious schemes (Higher Tier Countryside Stewardship and Landscape Recovery) now delayed. Environmental underspend has been matched by regulatory confusion, with key farming regulations that dropped out of the UK law with the end of cross-compliance still to be replaced.

Stasis and storm clouds on nature protections: Link's 2024 analysis of the amount of England protected and effectively managed for nature showed 3% protection on land and 8% on sea, a figure unchanged from the year before and largely reflective of the extent of protections a decade ago. Without a significant increase in these numbers, the Government will not meet its commitment to protect 30% of land and sea by 2030 and the closely related 2030 nature recovery target will be missed with it. The protected sites we do have could also be put at risk by planning policy. The Government is actively exploring how changes to environmental protections, including the critical Habitats Regulations, could speed the delivery of their housing and energy objectives. Link and other environmental organisations have set out why and how this acceleration must be delivered in a way that upholds nature protections.

Strained finances: Defra's operational budget, which supports much of the day-to-day spending nature recovery depends on, was hit by a 2.7% real terms cut in the budget. Pollution monitoring and enforcement by the Environment Agency and habitat restoration by Natural England could be particularly vulnerable to the downstream consequences of this cut. These threats are consequences of a wider problem; nature recovery remains reliant on public funding, due to underdeveloped private sector funding streams. The nascent Biodiversity Net Gain system has been undermined by exemptions, a strategic approach to nutrient pollution mitigation has yet to be taken and proposals to make large businesses pay for their nature impacts through a Nature Recovery Obligation have not been subject to meaningful consideration. A functioning nature market, on the scale as the carbon credits markets, will remain a pipedream without Government direction.

Further reading:

Link [briefing](#) on Sustainable Farming Incentive (November 2024)

Link [30x30 report](#) (October 2024)

Link [briefing](#) on planning reforms (July 2024)

2. What issues should the EFRA Committee prioritise in 2025 and why?

As set out above, farming, site protection and financial obstacles imperil the achievement of the nature recovery target, and with it the Government's wider environmental mission. In 2025 the EFRA Committee can usefully scrutinise Defra's deployment of tools to overcome those obstacles, including:

- Plans, as set out by Defra on Budget day, to increase the proportion of the farming budget going to Environmental Land Management (ELM) from 57% in 23-24 to 75% in 25-26. EFRA Committee work in this area could look at whether this shift will be sufficient to make progress towards environmental goals, especially if the overall farming budget remains flat and if the bulk of ELM spending continues to go towards the Sustainable Farming Incentive. Such an inquiry could also consider opportunities for Defra to do more to encourage public access to nature and reward high welfare livestock farming.
- The potential to introduce new farming regulations to ensure a level playing field for farmers and to further advance environmental goals. Replacements for cross compliance regulations on waterbody buffers and soil cover are still awaited and the EFRA Committee could usefully press Defra to set out their plans to fill these regulatory gaps.
- Measures to achieve 30x30, including expansion of the protected sites network on land and whole-site protections for Marine Conservation Areas. The EFRA Committee could usefully tease out how these policies, essential for achieving 30x30, could be implemented in such a way as to minimise impacts on other land and sea uses.
- The application of Biodiversity Net Gain to the Nationally Significant Infrastructure Projects (NSIP) regime, due to take place in November 2025. An EFRA Committee inquiry in early 2025 could generate recommendations on the best options for this application, including evidence on the potential for NSIP BNG to learn from the lessons of BNG as applied to standard development from April 2024. An inquiry could also consider Marine Net Gain, the development of which has been extremely slow.
- Plans for a new Nature Restoration Fund, announced in the Budget to 'offset the environmental impact of development'. The EFRA Committee could explore how such a Fund could underpin a new strategic approach to the mitigation of development impacts on nature, offering potential benefits for both development speed and nature recovery, and the environmental guardrails that would need to be put in place to ensure the latter. An inquiry on this topic could be broadened out to also consider expanding obligations for nature recovery to other sectors and to stimulating private markets for nature recovery.
- The 'handover list' from the previous administration; commitments to policies that would help meet the 2030 target made before May 2024, reaffirmed by the new Government but not yet delivered. The EFRA Committee could ask Defra Ministers to fully set out their timescales and plans for banning the use of peat in horticulture and for enshrining the Global Ocean Treaty in UK law.

Further reading:

Link [briefing](#) on Biodiversity Net Gain (September 2024)

Link [briefing](#) on the Nature Restoration Fund (November 2024)

3. Are there longer term or emerging issues that would benefit from Committee scrutiny over the next five years? For example, issues relating to climate change or new technologies.

Whilst there has been an understandable focus on sewage pollution in recent years, the growing problem of chemical pollution in English waterways (the reason why all no rivers in England are classed as good condition) has gone more under the radar. Ongoing climate change will exacerbate the effects of chemical pollution, with changing temperatures altering the toxicity of chemicals and weakening the ability of wildlife to overcome their effects. This growing and largely unnoticed threat to nature, and to public health, would benefit from an EFRA Committee spotlight.

Claims about the overall contribution that AI can make to environmental recovery are largely untested, and should be treated with caution. However there are some specific areas where the application of AI to process large amounts of simple data quicker than humans to appear to offer some real benefits for nature. One of those may be found in the recycling sector, where early evidence suggests that that AI application can speed processing times significantly. The EFRA Committee could look further into this, potentially as part of a wider inquiry into how Government commitments to move towards a more circular economy could be delivered. Currently progress towards this goal is limited with collection and packaging reforms faltering, an inquiry could highlight the lessons that need to be learned.

Finally, Nature-based solutions (NBS) to climate change are growing in efficacy and reducing in costs. Despite this take-up remains low, with Link research finding an allocation of just 2% of water company budgets in the Price Review 24 process. Ahead of the Price Review 29, EFRA could investigate the barriers to wider deployment of NBS, in the water sector and beyond.

Further reading:

Link [research](#) on chemical pollution (June 2024). See also CHEM Trust [material](#) on chemicals and climate.

Link [briefing](#) on the roadmap to a circular economy (July 2024).

Link [research](#) on Nature-based solutions at Price Review 2024 process (September 2024)

4. How could the Committee better gather and represent both your concerns and the views of those in your sector?

The stakeholder survey and associated meeting with eNGOs on 25th November is welcome and marks an excellent start to engagement in the new Parliament.

We hope that this engagement can be sustained. 86 nature, climate, access and animal welfare organisations belong to Wildlife and Countryside Link and are keen to engage with the EFRA Committee on a range of issues. Ongoing openness from the EFRA Committee to proposals for new inquiries from Link members, and timely notification of calls for evidence when inquiries are announced, would help sustain high quality engagement. Link is always happy to provide written or verbal evidence to inform inquiries and appreciates that sometimes requests for such evidence will come at very short notice.

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