

### Top lines on Targets

Legally-binding targets are the centrepiece of the Environment Act framework for restoring nature. If they are done well, they can provide the long-term certainty needed to drive action and investment in environmental restoration. Unfortunately, the Government's initial proposals are limited in scope and ambition. The final targets are due to be laid before Parliament in October – the proposals must be strengthened before then to live up to the promise of passing on nature in better condition.

1. The target to increase the abundance of wildlife by 10% by 2042 over 2030 levels is too weak and uncertain. It could mean that wildlife is less abundant by 2042 than it is now, after another decade of decline. This falls short of the promise to pass on nature in better condition.

**The Government should set a wildlife target to increase the abundance of species (marine and terrestrial) by at least 20% by 2042 over 2022 levels.**

2. The extent and quality of habitats are crucial to nature's recovery. At the moment, just 38% of SSSIs in England are in favourable condition, but the government has not proposed a statutory target to improve the state of protected sites, despite its previous promise to ensure that three quarters are in good condition.

**The Government should set a habitats target for at least 75% of our finest wildlife sites (SSSIs) to be in favourable condition by 2042.**

3. The Government's proposals for water targets miss out key sources of pollution and are limited in ambition. For example, the target for water companies does not cover nitrates or sewer overflows. In particular, there is no long-term target for the overall quality of rivers and streams. This means there is a risks that pollution could increase and the actual ecological quality of our rivers could continue to decline.

**Government should set a long-term "outcome" target for the overall ecological condition of rivers, streams and other freshwater bodies, in addition to stronger targets for pollution reduction and abstraction reduction.**

4. The Government's air quality proposals fall short of recognised standards for protecting public health. The deadline for meeting particulate pollution limits is a decade too slow, leaving people exposed to harmful pollution.

**The Government should bring forward the target deadline for particulate matter. To protect people from deadly pollution, PM2.5 air pollution should be lower than 10mg/m<sup>3</sup> by 2030.**

5. The Environment Act requires a target to be set for "waste and resource efficiency". Unfortunately, the proposals only include a target for reducing residual waste—the amount that goes to landfill or incineration. This does not tackle the ongoing over-consumption of raw materials, or help drive the transition to a more resource-efficient economy.

**The Government should set a target for reducing the extraction and consumption of raw materials driven by economic activity in England.**

## Top lines on the Green Paper

The Green Paper should set out measures to halt nature's decline by 2030. Stronger protection for sites and species is essential. Unfortunately, the proposals focus too much on simplifying process. They do not include vital changes for nature's recovery; on the contrary, there is a risk that over-simplification will lead to more litigation, greater costs, and weaker protection for nature.

1. The proposals for simplifying protected sites entail lots of bureaucratic change with very little benefit for nature. They caricature EU-derived protection as overly-bureaucratic, ignoring the scientific evidence of the effectiveness of SACs and SPAs. The Government must improve its proposals for protected sites reform, which currently risk weakening protection for habitats.

**All protected sites should be afforded greater protection from harm, including off-site and cumulative impacts, ruling out damaging activities and development. DEFRA should set out an expedited process for completing the protected site network.**

2. The Government is proposing to “fundamentally change” the UK's most effective conservation laws, the Habitats Regulations, giving more discretion to individual decision-makers. Choices about development and land use that affect protected sites must follow rigorous process; relying on individual discretion would increase uncertainty and the risk of environmental harm. Choices about site designation should also be scientific, not political.

**Existing site protection rules, including case law and Habitats Regulations Assessment, should be retained and applied to all protected sites and a wider range of plans, projects and activities. Enabling Ministers to designate SSSIs could help protect more sites but must only be in addition to the legal duty to designate sites that meet scientific thresholds.**

3. The proposals would fail to turn round the fortunes of declining species. Instead of rebranding and weakening protection, the Government should bring forward proposals for species recovery. Current rules focus on preventing harm to our most endangered wildlife. The Green Paper proposals should instead focus on creating thriving wildlife populations.

**The objective of achieving Favourable Conservation Status should be established in law as a guiding principle for species and habitat conservation, including informing which species are protected, and planning and licensing decisions that could affect those species.**

4. The Government is proposing reform of public bodies, arguing that the regulatory landscape has become fragmented and complex. Improvements in DEFRA's agencies are needed, particularly in regulation and enforcement. However, wider reform of public bodies could expend lots of time and effort, while holding back delivery of environmental objectives.

**Institutional improvement could be made by setting nature's recovery—and in particular achievement of statutory nature and climate targets—as statutory purposes for all existing public bodies, including the Forestry Commission, RPA and MMO.**

5. We welcome improvements in the Government's interpretation of 30x30—areas of land and sea protected for nature by 2030—but greater focus is still needed on positive management for nature's recovery. We also welcome a new nature recovery designation. However, it should be strengthened significantly to contribute to 30x30.

**To contribute towards the 30% target, areas must be protected and well-managed for nature. Nature recovery areas should be a new planning designation, in addition to existing protection. Sites should be identified through Local Nature Recovery Strategies, with a presumption against land use change that would hinder the recovery of nature.**