



# What price deregulation?

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The environmental and social costs of the  
Retained EU Law Bill

Wildlife and  
Countryside





Wildlife and  
Countryside



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## Introduction

The Retained EU Law (Revocation & Reform) Bill<sup>1</sup> is intended to “*save, repeal, replace, restate or assimilate*” the retained EU law (known as REUL) applying in the UK. The Bill will cover over 2,400 pieces of REUL, which will either be dropped or adapted into UK law.

This will be no bureaucratic tidying up exercise; the Government’s current official figures suggest that 570 pieces of the REUL sit with DEFRA (the highest number of any Government department).<sup>2</sup> We believe that even this high number is an underestimate<sup>3</sup> - as apparently does the DEFRA Secretary of State, who on 30.11.22 told the Lords Environment and Climate Change Committee that “*1,100 pieces of legislation were on the books*” at DEFRA<sup>4</sup> Whatever their precise number, these regulations constitute the protections we all rely on for clean air, clean water and access to green space, as well as providing crucial safeguards for a struggling natural world. These protections will now either be dropped from UK law, or (in most cases) be hastily rewritten by the 2023 deadline, or by an extended deadline in 2026.

This briefing sets out the consequences that that this regulatory upheaval could have. It is important to highlight that the rewriting of regulations, the likely outcome in the majority of cases (as opposed to complete abandonment), still constitutes a significant environmental threat. Redrafting regulations, which have taken decades of work and expert consultation to evolve, to a rushed timetable and a political imperative to ‘lessen environmental burdens’<sup>5</sup> will not be a cost-free process. Clause 15 of the Bill prevents redrafting from effectively strengthening regulations by precluding anything that would ‘increase regulatory burdens’, even if that burden amounts only to ‘administrative inconvenience’ for business. The deregulatory drift is very clear.

The Bill is an exercise in diminishment, equivalent to seeking to scrawl the blueprint of St Pauls Cathedral onto a napkin, with the clock ticking and an instruction to make it less like a cathedral.

The examples in this briefing set out some of the regulatory pillars that are at risk of being distorted or discarded as a result of the Bill. Such warping will have real-world impacts – green spaces will become greyer, water will become dirtier, and the air more polluted. Defences to protect animals from cruelty, people from chemical poisoning and community spaces from development will be lowered, with harmful consequences for social cohesion and our mental and physical health.

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<sup>1</sup> <https://bills.parliament.uk/bills/3340/publications>

<sup>2</sup> <https://public.tableau.com/app/profile/governmentreporting/viz/UKGovernment-RetainedEULawDashboard/Guidance>

<sup>3</sup> <https://www.mcsuk.org/news/analysis-the-retained-eu-law-bill/>

<sup>4</sup> <https://committees.parliament.uk/oralevidence/11979/pdf/>

<sup>5</sup> See the September 2022 Growth Plan: <https://www.gov.uk/government/publications/the-growth-plan-2022-documents>. The Sunak administration appears keen to progress and indeed expand the elements of the Growth Plan which talked of reducing ‘environmental burdens’ to hasten infrastructure delivery. The November 2022 Autumn Statement states that the “*Government will seek to accelerate delivery of projects across its infrastructure portfolio*” <https://www.gov.uk/government/publications/autumn-statement-2022-documents>



This paper considers only the environmental regulations in the Bill's firing line. Regulations protecting consumer and workers rights are also affected by the legislation – the cumulative impacts of such widespread regulatory change will be enormous.

These harmful outcomes are not inevitable. The Retained EU Law Bill does not need to happen – the wholesale rewriting of much of our regulatory framework is a voluntary act on the part of Government, which it could still decide to refrain from.

The frantic rewrite of thousands of regulations could be replaced by a steadier, more pragmatic process of gradual improvement. The Government could first acknowledge the need for a trans-national approach to some regulations<sup>6</sup>, recognise what is working well and then explore with civil society and the public any areas where regulations could evolve to deliver improved outcomes. If the Government really does want to reduce the burden on business whilst maintaining overall standards, it should also look closely at how regulations can be enforced in a fair and proportionate way to ensure a level playing field for all businesses. This is not the case at the moment in many sectors.<sup>7</sup> Such consideration of regulation enforcement is entirely lacking from Government proposals.

A more pragmatic, holistic approach to regulatory reform would save large amounts of public money. It would also avoid an unnecessary, rushed assessment of the majority of the UK's regulatory framework during a time when business uncertainty is already high and the cost of living, not the provenance of regulations, is at the forefront of people's minds.

We hope the Government heeds repeated warnings from businesses, unions and charities about the impact of the Bill<sup>8</sup>, and changes course. If it does not, the below impacts – amongst many others – loom large in our collective future. With them come the degradation of the natural world and the diminishment of human lives and our economy.

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<sup>6</sup> See more in Mythbuster section below

<sup>7</sup> See farming examples here: [https://www.wcl.org.uk/docs/WCL\\_Digging\\_Deeper\\_Report\\_14\\_Oct\\_%20Final.pdf](https://www.wcl.org.uk/docs/WCL_Digging_Deeper_Report_14_Oct_%20Final.pdf)

<sup>8</sup> See 23.11.22 letter in the Financial Times from businesses, unions & charities:  
<https://twitter.com/ruthmchambers/status/1595725135218200579>



## Less wildlife and wild spaces

### Key regulations affected by the Bill:

- The [Conservation of Habitats and Species Regulations 2017](#) (as amended) and the related [Conservation of Offshore Marine Habitats and Species Regulations 2017](#)

### What do those regulations do?

The Conservation of Habitats and Species Regulations 2017 (as amended) provide protection for important and vulnerable nature sites and species in England, over and above other domestic legislation. They are the most effective protections for nature and provide a level playing field and well-understood rules for developers and public authorities. The Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designations underpinned by the regulations effectively protect some of our most precious wildlife sites. The regulations also offer direct protections to particular species who require targeted conservation measures.<sup>9</sup>

The Conservation of Habitats and Species Regulations 2017 extend to 12 nautical miles off the coast. From 12 nautical miles off the coast to the boundary of territorial waters, the Conservation of Offshore Marine Habitats and Species Regulations 2017 apply to offer habitats and species protections.

### What effect would weakening the regulations have?

The current Habitats Regulations introduce conditions which must be met before development is permitted, to ensure that the development does not adversely affect the integrity of a SAC or SPA. Any weakening of these provisions through redrafting, including the loss of the current requirement to consider collective impacts from developments, could allow unsustainable developments to go ahead on or around important nature sites, even when they would cause damage to those sites.

Where development is deemed essential, the current Habitats Regulations require unavoidable damage to be mitigated for or compensated, other domestic site protection legislation does not require this. The loss of this robust requirement could lead to more developments proceeding without sufficient mitigation for nature.

The loss of years of case law based on the Habitats Regulations would also have the effect of weakening barriers to damaging development.

These increased development pressures would lead to the degradation of England's most important and vulnerable nature sites on land and at sea, including nationally and internationally important natural

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<sup>9</sup> A December 2022 report from RSPB highlights how effective Habitats Regulations protections have been for species targeted by them: <https://www.rspb.org.uk/about-the-rspb/about-us/media-centre/press-releases/uk-protected-sites-deliver-far-reaching-benefits-for-birds-say-landmark-new-studies/>





habitats. This damage could include more pollution reaching water habitats, and internationally important terrestrial habitats shrinking.

Some of these most important sites, particularly at sea (Marine SACs and SPAs), are already in a poor condition and development will impede any chance of recovery. If these marine sites lose their legal status they would be left with no designation or protection at all. This is because unlike on land, SACs or SPAs that lie below Mean Low Water are not underpinned by any other type of designation, such as SSSIs. These sites represent a significant proportion of the UK Marine Protected Area network.

Redrafting the Habitats Regulations could also see the loss of the protection of the breeding and resting sites of rare and vulnerable species which would result in further wildlife population declines.<sup>10</sup>

Such environmental diminishment could lead to the UK being in breach of international environmental law and treaties, including the Ramsar Convention on wetlands, the Bern Convention covering species and habitats and the OSPAR deal on the northeast Atlantic marine environment.

#### Which animals, plants and habitats would be worst affected?

- Nationally and internationally important nature sites on land and at sea in England, including the Ashdown Forest, Braunton Burrows, and Dogger Bank, will become more vulnerable to harms from development.
- Rare and vulnerable animal species, including bats, otters, harbour porpoises and dolphins, are currently protected from human interference (in the form of killing and habitat disturbance) by the Habitats Regulations. The weakening of these protections will lead to more killings and disturbance, harming whole species and their ability to recover from recent declines. For example, the loss of key parts of the Conservation of Habitats and Species Regulations 2017 without comparative replacement would mean the act of damaging, obstructing or destroying a bat roost could be decriminalised, weakening the protection of habitats for threatened bat species.

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<sup>10</sup> <https://www.rspb.org.uk/our-work/state-of-nature-report/>



### Case study: Catfield Fen

In 2016, Catfield Fen in Norfolk was protected under the Habitats Regulations from unsustainable water abstraction, due to its SAC designation for Annex I priority habitat, Calcareous Fen, and Annex II species the Fen Orchid (*Liparis loeselii*).

This nature reserve and adjoining privately owned fen are part of the Ant Broads and Marshes National Nature Reserve (NNR), one of the best and largest remaining areas of fen habitat in Western Europe, and part of The Broads SAC. At the time, Catfield Fen contained more than 50% of the native population of the Fen Orchid in its fenland form (*var. loeselii*) and the site is part of [The Broads Important Plant Area](#).

Catfield Fen is enclosed from the wider fen and river system, and particularly reliant on groundwater inputs. Concerns had been raised since the 1990s about it drying out and natural springs ceasing, and the nearby water abstractions started in the 1980s for irrigation of farm crop, were implicated.

In 2015, the Environment Agency (EA) refused to renew the abstraction licences, stating that: *“the EA cannot conclude the abstraction licences will have no adverse effect on the integrity of The Broads SAC, Broadland SPA and Broadland Ramsar, when considered in-combination with other permissions. The recommendation is that the applications should be refused due to the conclusions of the [updated] Habitats Directive Appropriate Assessment.”* ([EA Catfield Fen: decision on licence applications, 13 May 2015](#))

The licence holder, a local farmer, appealed and the case was heard by the Planning Inspectorate in 2016. Conservation groups including Butterfly Conservation (site owner), Plantlife (fen orchid conservation and translocation) and the RSPB (site manager) gave evidence to the inquiry in support of the EA’s decision. While there was uncertainty about the exact threat posed by water abstraction, the Inspector used the precautionary principle and dismissed the appeal (Ref: APP/WAT/15/316 & 317), helping to safeguard this site and its species for the future.

This case demonstrates clearly the vital legal protection provided by the Habitats Directive as well as the importance of the precautionary principle in such considerations.



## More polluted rivers

### Key regulations affected by the Bill

- The [Water Environment \(Water Framework Directive\) \(England and Wales\) Regulations 2017](#)
- The [Reduction and Prevention of Agricultural Diffuse Pollution \(England\) Regulations 2018](#) (Also known as the Farming Rules for Water)
- [The Urban Wastewater Treatment \(England & Wales\) Regulations 1994](#)

### What do the regulations do?

The Water Framework Directive drives holistic action to prevent the deterioration of the water environment and to improve water quality. It requires all waterbodies to reach good status and brings water companies, community and environmental stakeholders together behind this objective. The Directive has driven £3.7bn of investment in water quality over the past six years, resulting in measured improvements in 14.5% of waterbodies.<sup>11</sup> Further progress to good status across all water bodies over the coming years will unlock a range of ecological, social and economic benefits.

The Reduction and Prevention of Agricultural Diffuse Pollution regulations are designed to reduce pollution caused by wash-off from farmed soils, and the chemicals and animal waste bound up in those soils, into rivers. This is a significant cause of river pollution, with agricultural pollution affecting 40% of water bodies (by way of comparison, sewage pollution affects 36% of water bodies).<sup>12</sup> As the Environment Agency Chief Executive Sir James Bevan told the Environmental Audit Committee last year *“Statistically, the largest sector that is impacting our waters, in one way or another, is the farming sector.”*<sup>13</sup>

The Urban Wastewater Treatment (England & Wales) Regulations 1994 set out requirements relating to the collection, treatment and discharge of urban wastewater. These requirements have been the main driver for investment in primary wastewater treatment over recent decades.

### What effect would weakening the regulations have?

Weakening the Water Framework Directive would undercut a framework that effectively drives holistic action to improve water health and ecology across frontline organisations. The lessening of this central impetus could see progress towards cleaning up our rivers stall, with individual improvement measures becoming siloed. The holistic action driven by the Directive is also important for marine recovery – having healthier rivers at their estuarine and coastal stages flows into a having healthier ocean. The slackening of the drive to recover freshwater health would also impact on the recovery of the wider marine environment. Parts of these aquatic environments may no longer support wild animals including

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<sup>11</sup> <https://www.oecd.org/environment/resources/England-case-study-water-quality-and-agriculture-diffuse-pollution.pdf> (p2)

<sup>12</sup> <https://committees.parliament.uk/publications/8460/documents/88412/default/>

<sup>13</sup> <https://committees.parliament.uk/oralevidence/2434/pdf/>





fish that we have taken for granted as food for centuries, affecting both commercial and recreational fishers.

Weakening the Agricultural Diffuse Pollution regulations would allow increased levels of agricultural pollutants in our rivers. These pollutants are devastating to freshwater wildlife, reducing oxygen levels and killing fish outright in areas of particular concentration.

Weakening the Urban Wastewater Treatment (England & Wales) Regulations would reduce the pressure on water companies and developers to provide primary wastewater infrastructure sufficient to meet the needs of urban areas, especially when they are growing. This increases the risk of insufficiently treated wastewater from urban areas spreading pollution across the freshwater network, threatening human, animal and plant health.

Which animals, plants and habitats would be worst affected?

- Freshwater and migratory fish are particularly vulnerable to water pollution events, which can result in increased incidence of freshwater fish dying en masse.<sup>14</sup>
- Salmon populations illustrate the scale of population decline in our rivers, driven in part by pollution. 2021 figures showed a sharp fall in salmon stocks in rivers in England & Wales, with rivers classified as being “at risk” for salmon rising from 20 rivers (48%) in 2020 to 31 rivers (74%) in just one year.<sup>15</sup>
- Freshwater habitats are highly connected spaces, and declines in one population rapidly affect others. Frogs, kingfishers and otters are amongst the iconic animals at risk from pollution exacerbated by deregulation.

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<sup>14</sup> <https://www.rspb.org.uk/globalassets/downloads/our-work/troubled-waters-report>

<sup>15</sup> <https://anglingtrust.net/2022/07/26/further-decline-as-government-and-regulators-continue-to-fail-salmon/>



## Less healthy seas

### Key regulations affected by the Bill:

- The [Marine Strategy Regulations 2010](#)
- The [Marine Works \(Environmental Impact Assessment\) Regulations 2007](#) & the [Infrastructure Planning \(Environmental Impact Assessment\) Regulations 2017](#)

### What do those regulations do?

The Marine Strategy Regulations help deliver key obligations and commitments to achieve Good Environmental Status (GES) in our Seas. Achieving GES means our marine waters will be clean, healthy and productive, and that human activities in the marine environment will be within sustainable levels, safeguarding the long-term health of the ocean.

The Marine Works (Environmental Impact Assessment) Regulations 2007 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 together provide the framework for the assessment of the impacts that development projects will have on the ocean. The Regulations are essential to ensure the protection of the wider marine environment from development pressures and link to the achievement of Good Environmental Status as part of the Marine Strategy Regulations.

### What effect would weakening the regulations have?

Currently the Marine Strategy places obligations on the UK Government to take steps towards achieving Good Environmental Status, and to monitor and report on progress towards achieving GES through consistent marine environmental monitoring and standards. Currently the UK has only achieved GES in 4 of the 15 descriptors, with 5 more partially meeting GES.<sup>16</sup> Weakening these regulations would mean reducing the obligation on Government to make further progress towards GES, and to monitor and report on that progress. The policy imperative to recover ocean health would slacken, causing further ecological damage and risking the collapse of more wild fisheries.

Weakening the two Environmental Impact Assessment (EIA) regulations could loosen the requirements on those progressing marine projects to provide evidence of environmental impact, to inform decision making, and reduce the mitigation measures should a project go ahead. This will increase harmful impacts from development upon marine species and habitats. There will be a substantial increase in offshore infrastructure from energy security ambitions over the next 30 years which will result in the increased industrialisation of our sea. Strong regulations requiring environmental assessment of marine development is therefore vital to ensure marine species and habitats can recover alongside sustainable use of the sea.

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<sup>16</sup> <https://www.wcl.org.uk/docs/WCL%20-%20Marine%20Scorecard%20report%20results.pdf>



Between them, the Marine Strategy Regulations, the Environmental Impact Assessment (EIA) regulations and the marine coverage of the Habitats Regulations underpin much our current system of marine protections. Without this EU-derived regulatory underpinning of our SACs and SPAs, legal targets of recovery as laid out the domestic legislation such as the Environment Act will not be achieved.

Which animals, plants and habitats would be worst affected?

- Marine and coastal habitats like seagrass meadows, saltmarshes and UK native oyster reef are vital 'blue carbon' stores, essential to us meeting net zero. Unfortunately, they have been in decline for decades - the last century saw the loss of 50% of seagrass meadows, 85% of UK saltmarsh and 95% UK native oyster reefs.<sup>17</sup> These precious habitats, and their potential to contribute to net zero will be vulnerable to further decline if GES imperatives slacken and harmful impacts from marine development increase.
- The faltering of progress towards ocean recovery threatens all marine species, who are highly inter-connected and already in decline. For example, extensive research has shown that declines in sand eel populations directly contributes those species that rely on them on a food source, including kittiwakes, (whose UK population has halved since the 1960s), and puffins both of which have been declared as at risk of global extinction by the IUCN Red List of Threatened Species.<sup>18</sup>
- Due to the scale of offshore development expected over the next 30 years, weakened environmental protection will result in significant ecosystem consequences. For example, loss of seabed habitats will reduce food source for multiple mobile species include harbour porpoise, bottlenose dolphins and minke whales.

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<sup>17</sup> <https://ecsa.international/reach/restoring-meadow-marsh-and-reef-rememare>

<sup>18</sup> <https://www.rspb.org.uk/our-work/policy-insight/england-westminster/policy-briefings/sandeel-fisheries-in-uk-waters/>



## More harmful chemicals in our everyday lives

### Key regulations affected by the Bill:

[Regulation \(EC\) No 1907/2006](#) The REACH (Registration, Evaluation, Authorisation and restriction of Chemicals) Regulation

[Regulation \(EC\) No 1272/2008](#) CLP (Classification, Labelling and Packaging of chemicals)

### What do those regulations do?

Both REACH and CLP work together to provide a comprehensive legal framework to regulate the use of chemicals. The regulations include restrictions on the use of over 2,000 harmful chemicals.

REACH enables assessment of the risks posed by different industrial chemicals and the implementation of control measures. It does this by requiring companies to provide sufficient safety data for chemicals they place on the market, so that the regulator can check appropriate risk management measures are in place, and by setting out processes by which the regulator can put in place controls on chemicals that pose risks to human health or the environment.

Following Brexit, REACH was replicated in the UK with the changes needed to make it operable in a domestic context. It is now known as UK REACH.

### What effect would weakening the regulations have?

If UK REACH and CLP are weakened, controls on the use of harmful chemicals could be loosened. More products could reach the UK market, from sofas and paint to cosmetics and toys, that contain chemicals that are linked to cancer, or impaired intellectual development, that were previously banned or restricted in the UK.<sup>19</sup>

Before EU REACH was introduced in 2006, chemicals regulations were largely ineffective and widely discredited. There is a real risk of returning to a weaker or even laissez-faire approach, which would have serious implications for the health of our environment and the UK population.

The global chemical industry has been projected to double by the year 2030<sup>20</sup>, increasing the risk posed by a deregulatory approach. In light of this increase and growing knowledge about chemical harms, the UK should be strengthening its ability to limit the use of harmful chemicals, not weakening it.<sup>21</sup>

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<sup>19</sup> <https://chemtrust.org/diseases/>

<sup>20</sup> <https://www.unep.org/news-and-stories/press-release/un-report-urgent-action-needed-tackle-chemical-pollution-global>

<sup>21</sup> <https://chemtrust.org/12-key-asks-uk-chemicals-strategy/>



Which animals, plants and habitats would be worst affected?

- Harmful chemicals build up through the food chain. Marine mammals including killer whales and dolphins, are particularly at risk. Previous chemical build ups have caused sterility and suppressed the immune system of killer whales and dolphins in UK waters.<sup>22</sup>
- Freshwater wildlife including fish and aquatic insects are also particularly vulnerable since chemicals from land (including road runoff, leachate from landfill, agricultural pollution and wastewater discharges) often end up in the freshwater environment. These pollutants can accumulate in the tissues of flora and fauna.
- Children are vulnerable to chemical harms from products used on toys, including the chemicals known as phthalates. Phthalates can have adverse effects on children's health and are associated with a range of toxic effects, including disruption of the hormone system and metabolic diseases.<sup>23</sup> The use of a number of phthalates in toys is currently banned by REACH<sup>24</sup>, any weakening of these regulations could see the prevalence of these chemicals on toys creep back up, causing a direct threat to the health of children, and the wider environment (the chemicals on toys can pollute into the wider environment when not properly disposed of).

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<sup>22</sup> <https://www.mcsuk.org/what-you-can-do/campaigns/stop-ocean-poison/>

<sup>23</sup> <https://chemtrust.org/new-research-shows-link-between-dehp-phthalate-exposure-and-development-of-baby-boys/>

<sup>24</sup> <https://echa.europa.eu/documents/10162/aaa92146-a005-1dc2-debe-93c80b57c5ee>

## More pesticides in our environment

### Key regulations affected by the Bill:

- The [Plant Protection Products Regulations 1107/2009](#)
- The [Sustainable Use Directive](#)
- [Regulation \(EC\) 396/2005](#)

### What do those regulations do?

Pesticides are substances used to eliminate pests (such as weeds, insects or fungi) which damage crops. The use of pesticides can have significant unintended consequences for wild species and for human health.<sup>25</sup>

The Plant Protection Products Regulations set out the approval process and emergency use process for all pesticides. This underpins the central authorisation process used to minimise adverse ecological and human health impacts from pesticide use.

The Sustainable Use Directive requires the Government to adopt and implement a National Action Plan to reduce pesticide harms, and to encourage less harmful methods of pest control.

Regulation (EC) 396/2005 protects consumer health by setting maximum residue levels of pesticides in the human food chain.

### What effect would weakening the regulations have?

Weakening the Plant Protection Products Regulations would lead to less stringent tests for pesticides before they are authorised for use in the UK, opening the door to more dangerous products in our fields, and ultimately our food.<sup>26</sup>

The Plant Protection Products Regulations also provide a good example of the deleterious effect of clause 15 of the Bill. The stipulation in the clause that replacement regulations should “*not increase the regulatory burden*” on business effectively rules out any future strengthening of the pesticide approvals process, as more stringent tests on pesticide products would likely require increased product safety work on the part of agrochemical companies. Pre-emptively prohibiting measures that could protect the public and the environment from new pesticide harms, in order to shield a small group of companies from possible increased workload, is not sensible policy making. Our understanding of pesticide impacts is growing all the time, as such our regulatory protections need to retain the ability to become more robust if required. Clause 15 removes this flexibility.

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<sup>25</sup> <https://www.pan-uk.org/health-effects-of-pesticides/>

<sup>26</sup> See Client Earth briefing for more detail: [https://www.clientearth.org/media/irtp0mmt/clientearth\\_the-impact-of-the-reul-bill-on-the-regulation-of-pesticides\\_1-12-2022.pdf](https://www.clientearth.org/media/irtp0mmt/clientearth_the-impact-of-the-reul-bill-on-the-regulation-of-pesticides_1-12-2022.pdf)





Weakening of the Sustainable Use Directive and Regulation (EC) 396/2005 would undercut efforts to encourage the use of pesticide alternatives, and an Integrated Pest Management approach, and inhibit work to curb pesticide harms and to set maximum levels of pesticides in food.

Significantly, weakened regulations could also undermine decisions made under regulations to date. Decisions such as the 2018 ban on non-emergency use of neonicotinoids, due to their impacts on pollinator populations<sup>27</sup>, were made under the EU regulations. The amendment of these regulations leaves the legal status of decisions made under them open to question. Banned pesticides could become legal to use once again.

#### Which animals, plants and habitats would be worst affected?

- Insects, including the pollinators arable farming relies on, are particularly vulnerable to harmful pesticides.<sup>28</sup> Declines in insect populations driven by pesticide use harms other wildlife further down the line<sup>29</sup>, including iconic mammals like hedgehogs who rely on insect abundance for part of their diet.
- Pesticide use has been shown to exacerbate soil erosion, undermining (especially when combined with pollinator loss) the ability of our arable land to keep on producing food into the future<sup>30</sup> and contributing to freshwater pollution.
- Chalk streams are beautiful, fragile habitats that can be devastated by pesticide pollution. While surveying river quality in 2018, Salmon & Trout Conservation (now WildFish) discovered that pesticides from a salad washing factory were polluting streams in the Upper Itchen river basin, presenting a serious threat to aquatic and invertebrate life in highly protected English chalk streams.<sup>31</sup>

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<sup>27</sup> <https://www.gov.uk/government/news/further-restrictions-on-neonicotinoids-agreed>

<sup>28</sup> [https://policy.friendsoftheearth.uk/sites/default/files/documents/2019-12/Problem%20with%20Pesticides%20report%20Dec%202019\\_0.pdf](https://policy.friendsoftheearth.uk/sites/default/files/documents/2019-12/Problem%20with%20Pesticides%20report%20Dec%202019_0.pdf)

<sup>29</sup> <https://wildfish.org/wp-content/uploads/2022/08/Chemical-Pollution-The-Silent-Killer-of-UK-Rivers-2022.pdf>

<sup>30</sup> <https://www.pnas.org/doi/10.1073/pnas.1411512111>

<sup>31</sup> <https://chemtrust.org/wp-content/uploads/End-Chemical-Pollution-Briefing-Draft-FINAL-July-2022-CLEAN-WCL-007.pdf>



## Dirtier air

Key regulations affected by the Bill:

The [National Emission Ceilings Regulations 2018](#)

What do those regulations do?

The National Emission Ceilings Regulations puts absolute caps on national emissions of 5 key pollutants (PM2.5, NO<sub>x</sub>, SO<sub>2</sub>, ammonia and NMVOCs) from 2020 and 2030. These caps, and the need not to exceed them, provide the legal impetus underpinning the Government's Clean Air Strategy.<sup>32</sup>

What effect would weakening the regulations have?

The regulations drive policy analysis and interventions to meet the emissions caps. The slackening of that drive, through a weakening of the regulations, would likely reduce the pace and ambition of air pollution policies in the UK.

The National Air Pollution Control Programme provides an illustrative example.<sup>33</sup> This document is currently built around the National Emission Ceilings, reporting progress towards meeting them and setting out policy options to enable further progress. A weakening of the National Emission Ceilings regulations would inhibit this catalyst for increasing ambition on air pollution policy.

Which animals, plants and habitats would be worst affected?

- Vulnerable children and adults in heavily polluted areas will have poorer health outcomes, limiting both quality and length of life, with associated increases in NHS costs.<sup>34</sup>
- Air pollution also impacts the health of animals and plants, especially trees. The Woodland Trust's State of the UK's Woods and Trees report identifies nitrogen air pollution as one of the most widespread and significant threats to woodland ecosystems in the UK.<sup>35</sup>

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<sup>32</sup> <https://www.gov.uk/government/publications/clean-air-strategy-2019>

<sup>33</sup> [https://consult.defra.gov.uk/napcp/consultation-on-the-draft-national-air-pollution-c/supporting\\_documents/Draft\\_NAPCP\\_for\\_consultation.pdf](https://consult.defra.gov.uk/napcp/consultation-on-the-draft-national-air-pollution-c/supporting_documents/Draft_NAPCP_for_consultation.pdf)

<sup>34</sup> <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/708855/Estimation\\_of\\_costs\\_to\\_the\\_NHS\\_and\\_social\\_care\\_due\\_to\\_the\\_health\\_impacts\\_of\\_air\\_pollution\\_-\\_summary\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/708855/Estimation_of_costs_to_the_NHS_and_social_care_due_to_the_health_impacts_of_air_pollution_-_summary_report.pdf)

<sup>35</sup> <https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/british-trees/tackling-air-pollution-with-trees/>



## Less healthy countryside

Key regulations affected by the Bill:

The [Common Agricultural Policy \(Cross-Compliance Exemptions and Transitional Regulation\) \(Amendment\) \(EU Exit\) Regulations 2022](#)

What do those regulations do?

Cross compliance comprises a system for penalising breaches of EU law and good practice, effectively requiring farmers and land managers who receive government payments to protect boundary features such as hedgerows, stone walls, earth banks and stone banks. These requirements include a hedge cutting ban period and a ban on cultivation, pesticide and fertiliser use within 2m of a hedge or other boundary feature, to protect the many species that rely on healthy hedge habitats.

Farmers are also required to maintain buffer strips next to water courses, to help prevent agricultural run-off from polluting rivers, and to take steps to reduce soil erosion.

What effect would weakening the regulations have?

The Sustainable Farming Incentive (SFI) is expected to offer a hedgerow standard, which will pay for good management of hedgerows. However, as this is a voluntary scheme, a potentially sizable proportion of farmers will not take it up. We will continue to need strong, nation-wide regulations to protect hedges across all farmed land. The weakening of such regulations could see hedges on farms not taking part in SFI schemes removed to increase field sizes, or be neglected, mismanaged or damaged.

Similarly, water course buffer strips on farms not taking part in SFI or other Environmental Land Management (ELM) schemes could become vulnerable, as could soil erosion measures.

Cross-compliance is already [due to end in 2024](#), with no firm plans yet in place to ensure comprehensive carry-over of these vital protections, beyond farms taking part in SFI or other ELM schemes. The Retained EU Law Bill means these crucial countryside safeguards have a deeply uncertain future, putting the transition to more environmentally friendly farming at risk.

Which animals, plants and habitats would be worst affected?

- Hedgerows support 130 priority species under England's Biodiversity Action Plan, including hedgehogs, yellowhammers, bees, butterflies and bats.<sup>36</sup> Damage to hedgerows means damage to these species.

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<sup>36</sup> <https://www.rspb.org.uk/globalassets/downloads/documents/mind-the-gap-report-final.pdf>





- An ORC field study found that hedgerows between 3.5m and 6m wide could sequester as much as 131.5 tonnes of carbon a year.<sup>37</sup> This tool to help us reach net zero would be blunted by deregulation.
- Hedgerows are good for farm businesses, providing shelter and food for livestock, and improving crop yield by encouraging insects beneficial to pest control and pollination.<sup>38</sup> Hedgerow loss means long term profit loss for farmers.
- Poor water quality and physical damage to river habitats resulting from agriculture is estimated to cost £1.3 billion per annum and is the primary reason for a third of water bodies failing to meet Water Framework Directive objectives.<sup>39</sup> These impacts will worsen if cross-compliance regulations are completely lost.

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<sup>37</sup> <https://www.cpre.org.uk/wp-content/uploads/2021/09/Hedge-fund.pdf>

<sup>38</sup> <https://ptes.org/hedgerow/what-have-hedgerows-ever-done-for-us/>

<sup>39</sup> <https://www.nao.org.uk/wp-content/uploads/2010/07/1011188.pdf>



## More waste and litter

### Key regulations affected by the Bill:

The [Packaging \(Essential Requirements\) Regulations 2015](#)

The [Landfill \(Maximum Landfill Amount\) Regulations 2011](#)

The [Waste Electrical and Electronic Equipment Regulations 2013](#) (as amended)

### What do those regulations do?

The Packaging (Essential Requirements) Regulations 2015 place crucial health and environmental requirements on companies designing and manufacturing packaging. They play an important role in ensuring hygiene and safety for consumers, by placing restrictions on the use of noxious or hazardous substances in packaging and setting requirements on reuse and recycling of packaging.

The Waste and Emissions Trading Act 2003 and Landfill (Maximum Landfill Amount) Regulations 2011 aim to prevent or reduce as far as possible the negative effects of landfilling on the environment as well as any resultant risk to human health. The Act seeks to achieve this through specifying uniform technical standards and setting out requirements for the location, management, engineering, closure and monitoring of landfills. The Landfill Regulations 2011 specify the maximum amount by weight of biodegradable municipal waste that is allowed to be sent each target year to landfills.

The Waste Electrical and Electronic Equipment Regulations 2013 require businesses to minimise waste arising from their electrical and electronic equipment products (known as e-waste) and promote their reuse. They also require businesses to ensure their waste products are treated correctly and meet recovery and recycling targets for the waste materials, and design products to reduce material use and enhance reusability and recyclability.

### What effect would weakening the regulations have?

Redrafting the Packaging (Essential Requirements) Regulations 2015 could see environmental standards for packaging (which makes up a fifth of UK household waste) weakened. This risks creating more packaging waste which could be harder to reuse or recycle.

Redrafting the Waste and Emissions Trading Act 2003 and Landfill (Maximum Landfill Amount) Regulations 2011 could see more biodegradable waste sent to landfill, leading to greater greenhouse gas emissions as it rots. Further, there is a risk that a weakening of standards around landfills could lead to greater pollution of land, ground water and water ways from leachate.

Redrafting the Waste Electrical and Electronic Equipment Regulations 2013 (as amended) could make it easier for badly designed electrical and electronic equipment to go on sale, leading to more e-waste.



The UK is already the second highest producer of e-waste in the world and one of the worst offenders in Europe for sending illegal e waste shipments to lower income countries.<sup>40</sup>

Which animals, plants and habitats would be worst affected?

- Food and drink packaging is one of the major sources of marine litter which pollutes our seas and beaches, killing over a million sea birds a year.<sup>41</sup>
- Food and drink packaging is also littering our terrestrial habitats. Keep Britain Tidy's 21/22 survey found litter from packaging items at 64% of surveyed sites.
- If not properly disposed, toxins from electronic waste can enter the soil and water supplies, harming animal and human health.
- High levels of methane gas and CO<sub>2</sub> generated by the rotting rubbish in landfills contributes significantly to climate change.

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<sup>40</sup> <https://www.letsrecycle.com/news/uk-the-second-largest-producer-of-weee/>

<sup>41</sup> <https://www.keepbritaintidy.org/get-involved/support-our-campaigns/plastic-challenge/impact-wildlife>





## More invasive species

### Key regulation affected by the Bill

- The [Invasive Alien Species \(Enforcement and Permitting\) Order \(2019\)](#)

### What does the regulation do?

The Invasive Alien Species (Enforcement and Permitting) Order (2019) lists invasive species of concern and sets out rules to prevent their introduction and spread. It underpins an invasives enforcement regime, including criminal sanctions for people introducing invasive species of concern into the UK.

### What effect would weakening the regulations have?

Invasive species are one of the top five drivers of biodiversity loss worldwide. In the UK, the impacts of Invasive non-native species (INNS) are evident across all ecosystems, but are particularly severe in our native woodlands, freshwater habitats, and islands. Invasive species can devastate native wildlife populations, accelerating species decline and resulting in less resilient environments.

There are many well-known examples of the impact of INNS. The well-understood impact of the invasive grey squirrel on native red squirrels illustrates just how catastrophic invasive impacts can be, as does the spread of signal crayfish in our rivers<sup>42</sup>. Invasive fish also pose a significant threat to the ecology and wildlife of our rivers and lakes, and the fisheries that they support.

These impacts also have an economic cost – in 2010 a Defra-commissioned report estimated that invasive species cost the UK economy £1.7 billion a year.<sup>43</sup> Inflation suggests that figure would now be at least £2.2 billion, the increased spread and number of invasive species since 2010 would make this figure higher still. The arrival of ash dieback, which decimated our native ash populations across the UK, with estimates suggesting a loss rate of up to 80% and a financial hit of £15 billion, illustrates how high the costs of individual invasive species can be.<sup>44</sup> We know that there are at least 127 other high risk pests and diseases that present a significant threat to UK trees if imported – of these, 47 could cost over £1 billion each to tackle, and would result in the loss of millions of trees.<sup>45</sup>

The Invasive Alien Species (Enforcement and Permitting) Order is only the piece of current legislation that works to prevent the introduction of invasive species. Other pieces of legislation regarding invasive species work only to prevent their spread, and do not contain powers to stop the introduction of them

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<sup>42</sup> <https://anglingtrust.net/wp-content/uploads/2022/07/Position-statement-predation-crayfish.pdf>

<sup>43</sup> [https://www.researchgate.net/publication/298559361\\_The\\_Economic\\_Cost\\_of\\_Invasive\\_Non-Native\\_Species\\_on\\_Great\\_Britain](https://www.researchgate.net/publication/298559361_The_Economic_Cost_of_Invasive_Non-Native_Species_on_Great_Britain)

<sup>44</sup> <https://www.ox.ac.uk/news/2019-05-08-ash-dieback-predicted-cost-%C2%A315-billion-britain>

<sup>45</sup> <https://www.woodlandtrust.org.uk/press-centre/2020/12/cheap-imports-risk-millions-of-trees/>



in the first place. The weakening of the order would open a breach in the UK's defences against invasive species, threatening the UK ecosystems, the services they provide and the UK economy.

At a time when the threat posed by INNS is unprecedented due to the increased impact as a result of climate change, we should be strengthening our legislation, infrastructure and resources to prevent arrival, which is the most cost-effective means of managing INNS rather than potentially weakening existing legal framework.

Which animals, plants and habitats would be worst affected?

- Ash trees, native flat oysters and water voles are amongst the plant and animal species at particular risks from invasives.<sup>46</sup>

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<sup>46</sup> <https://www.wcl.org.uk/uk-wildlife-at-high-risk-from-inns.asp>



## Less protections for animals

Key regulations affected by the Bill:

[Directive 2010/63](#)

[Directive 1999/74](#)

[Regulation 139/2013](#) Wild bird import ban (originally Decision 2005/760)

The [Welfare of Animals \(Transport\) \(England\) Order 2006](#)

What do those regulations do?

Directive 2010/63 covers the use of animals in research, testing and education. It protects the 3 million animals used in testing and research in the UK, providing basic welfare safeguards for live animal testing.<sup>47</sup>

Directive 1999/74 bans the use of barren cages for laying hens, one of the key advances in recent decades for farmed animal welfare.

Regulation 139/2013 stops the importation of wild caught birds for the pet trade. The implementation of the regulation in 2005 saw the illegal trade in parrots significantly reduce and is one of the clearest and best examples of enforced animal welfare legislation impacting on the illegal trade.

The Welfare of Animals (Transport) (England) Order 2006 requires basic welfare conditions to be met when animals are transported, making it an offence to transport any animal in a way which causes injury or unnecessary suffering.

What effect would weakening the regulations have?

Weakening Directive 2010/63 could see a fall in standards of accommodation and care for animals used in research. For example, article 14 of the Directive requires, where possible, for animal experiments to be carried out under general or local anaesthesia. The removal of this requirement could greatly increase the scale of animal suffering in experiments.

Weakening Directive 1999/74 could change acceptable cage standards for laying hens, allowing the expansion of battery chicken farming through the back door.

Weakening Regulation 139/2013 could re-fuel demand for the trade in wild-caught bird, leading to further despoilation of wild bird populations in South America, Africa and Asia. The EU-wide ban,

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<sup>47</sup> <https://www.gov.uk/government/statistics/statistics-of-scientific-procedures-on-living-animals-great-britain-2021>





introduced through the Regulation in 2005, reduced the volume of wild bird trading to about 10% of its former level.<sup>48</sup> A UK departure from that ban could see numbers creep back up.

Weakening the Welfare of Animals (Transport) (England) Order 2006 could see UK welfare standards for animal transportation fall below that of our neighbours in the EU. It would also mark the complete reversal of the UK Government's plans to increase welfare standards in transportation following Brexit, already stalled through the halting of the Kept Animals Bill.<sup>49</sup>

Which animals, plants and habitats would be worst affected?

- Mice, fish, cats, dogs, horses, rabbits, monkeys used in laboratory experiments in the UK.
- Chickens used in poultry farming.
- Parrots, cockatoos, lovebirds and other wild caught birds.
- Farmed animals subject to live transportation.

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<sup>48</sup> <https://www.science.org/doi/10.1126/sciadv.1700783>

<sup>49</sup> <https://www.hsi.org/news-media/animal-protection-organisations-urge-prime-minister-dont-betray-animals/>



## Mythbuster

Ministers have made a number of claims about why the Retained EU Law Bill has been introduced and the impact it will have. We respond to those claims below:

Claim: 'Environmental regulations from the EU cover too wide a geographic area to be effective. Our regulations will be targeted on the UK and will be more effective as a result.'

**Reality: The natural world does not stop at national borders.** Wild animals and plants can shift their range across borders, especially in the face of climate change, as long as suitable habitat is available and well connected.<sup>50</sup> Trans-national regulations like those inherited from our membership of the EU are needed to respond to this. Trans-national regulations also have crucial roles to play in stopping businesses undercutting each other and distorting European markets. For example, lower animal welfare regulations in one European country could allow farmers to undercut farmers from a neighbouring country by exporting their products for a sale at a lower price, reaping commercial benefit from having lower production costs due to lower welfare regulations. Finally, trans-national regulations also help countries to comply with international legal obligations, such as those arising from the Conference of the Parties to the Convention on Biological Diversity (CBD COP).

Claim: 'We are reviewing environmental regulations in order to improve them and deliver better outcomes for the environment.'

**Reality: The Bill will prevent regulations from being improved for the environment.** Over the course of November 2022, a range of expert witnesses set out to the Public Bill Committee how clause 15 of the Bill, which prohibits replacement regulations that would increase the burden on business, would prevent regulations being improved to deliver greater environment, animal welfare and human health benefits. In the words of Dr Ruth Fox, Director of the Hansard Society: *"It is hard to see how the kinds of enhancements that have been talked about—for example, in relation to animal welfare—would not necessarily imply an administrative burden; they therefore could not be done under this provision."* Dr Richard Benwell, CEO of Wildlife & Countryside Link, described clause 15 as resulting in a *"lock-in of deregulation where you might otherwise find improvements - we want to improve the law, but the Bill does not allow us to do that."*

The wholesale review of regulations required by the Bill also has knock on effects which directly inhibit the delivery of better outcomes for the environment. As set out by the Office for Environmental Protection in their written evidence on the Bill: *"The significant time that will be spent reviewing environmental REUL will come at a cost to other pressing issues for the environment, for example, the detailed work necessary to ensure effective implementation of the next Environmental Improvement Plan."*<sup>51</sup> In her verbal evidence to the Public Bill Committee, Dr Ruth Chambers, Senior Fellow at Green Alliance, spoke of the *"opportunity costs that will inevitably come with the Department having to review, assimilate and reform such a large body of law. In fact, the Government have already missed their first*

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<sup>50</sup> <https://www.pnas.org/doi/10.1073/pnas.2011204118>

<sup>51</sup> <https://www.theoep.org.uk/report/oep-submission-retained-eu-law-bill-committee>



*legal milestone on environmental targets, on 31 October. That is just one example of how this can have a serious impact—because of the sheer deliverability challenges.”*

Those defending the Bill have themselves made it clear that its primary objective is not environmental improvement, and that the interests of the environment are subordinate to the (perceived) interests of the economy within it. In the words of Bill Minister Nusrat Ghani MP, when arguing at Public Bill Committee against an amendment which would have exempted environment regulations from the legislation: *“The Bill will allow Departments to unleash innovation and will propel growth across every area of our economy. The power in clause 15 to revoke or replace is an important, cross-cutting enabler of reform. Exempting regulations associated with environmental protections from the power will reduce the genuine reform that the Bill sets out to deliver.”*<sup>52</sup>

The Retained EU Law Bill has been introduced to promote a certain vision of economic growth (and fails in its own terms at that, as set out below). Claims that environmental improvement is something sought for – or is even permitted by – the Bill simply do not stand up to scrutiny.

Claim: ‘Regulations hold business back. Reducing regulations will boost growth.’

**Reality: Regulations provide certainty and stability for businesses.** The Bill is opposed by many businesses because of the unnecessary uncertainty it will create. In the words of a November 2022 open letter opposing the Bill signed by business groups and representatives, including the Institute of Directors and the Chartered Institute of Personnel and Development: *“Making these changes will prove costly and bureaucratic and would undermine the certainty and stability workers and businesses need if the economy is to prosper”*.<sup>53</sup>

By preventing replacement regulation from creating burdens for business clause 15 of the Bill is expected to cause particular uncertainty, which will persist for years. When giving evidence to the Public Bill Committee on 08.11.22 Professor Alison Young, a Professor of Public Law at the University of Cambridge, highlighted that the clause will *“leave these particular measures open to potential legal challenges because people will argue ‘This has increased my burden in these circumstances’. That, in turn, could add to legal uncertainty.”* This concern was re-iterated by other witnesses, including Mark Fenhalls KC, Chair of the Bar Council, who told the Committee that *“an organisation such as TheCityUK, which represents a range of financial services, accountancy, law and consultancy firms, will tell you that all its international clients are saying, “We don’t know what the rules are going to be; therefore, we are troubled.”* Eleonor Duhs, Partner, Head of Data Privacy at Bates Wells agreed, saying: *“They want to invest, but you cannot invest if you do not know what the law is going to be.”*<sup>54</sup>

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<sup>52</sup> [https://publications.parliament.uk/pa/bills/cbill/58-03/0156/PBC156\\_Retained\\_EU\\_Law\\_1st-8th\\_Compilation\\_29\\_11\\_2022.pdf](https://publications.parliament.uk/pa/bills/cbill/58-03/0156/PBC156_Retained_EU_Law_1st-8th_Compilation_29_11_2022.pdf)

<sup>53</sup> Letter published by Financial Times on 23.11.22 <https://www.ft.com/content/b894b195-6adc-48eb-80c3-efe7f818d452>

<sup>54</sup> [https://publications.parliament.uk/pa/bills/cbill/58-03/0156/PBC156\\_Retained\\_EU\\_Law\\_1st-8th\\_Compilation\\_29\\_11\\_2022.pdf](https://publications.parliament.uk/pa/bills/cbill/58-03/0156/PBC156_Retained_EU_Law_1st-8th_Compilation_29_11_2022.pdf)





Many companies plan to long timeframes (for example, the water industry plans run on a minimum 25-year timeline) so long-term certainty is crucial. The Bill befogs business outlooks.

These immediate business uncertainties are compounded by the harmful effects the environmental depredation unleashed by the Bill will have on the natural services the economy relies on; a healthy environment is a prerequisite of a healthy economy.<sup>55</sup> The environmental declines deregulation will accelerate will heavily impact our economy, from increased flooding<sup>56</sup> to reduced farming yields<sup>57</sup>, harming businesses across a range of sectors.

Claim: 'The Bill will make Government more efficient'

**Reality: The unnecessary re-writing of much of our regulatory framework will take up colossal amounts of civil service and parliamentary time.** It constitutes 'Government waste' at its most acute.

Claim: 'There is a democratic mandate for the Bill'

**Reality: The 2019 Conservative Party Manifesto on which this Government was elected did not include a commitment to remove or rewrite all REUL.** The Manifesto pledged only to deliver "better regulation" whilst recognising that "good regulation is essential to successful businesses".<sup>58</sup> There is no clear mandate for the Bill or signs of popular support for deregulation. Polling from Unchecked UK shows 74% of UK public thinks that current levels of regulation are either right or not strong enough at present.<sup>59</sup>

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*[Wildlife and Countryside Link](#) (Link) is the largest nature coalition in England, bringing together 67 organisations to use their joint voice for the protection the natural world.*

December 2022

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<sup>55</sup> <https://www.wcl.org.uk/docs/Letter%20to%20Liz%20Truss%20on%20Environmental%20Regulation%20-%202003.10.22.pdf>

<sup>56</sup> <https://www.lse.ac.uk/granthaminstitute/explainers/how-is-climate-change-affecting-river-and-surface-water-flooding-in-the-uk/#:~:text=in%20the%20UK%3F-,How%20is%20climate%20change%20affecting%20river,water%20flooding%20in%20the%20UK%3F&text=Climat e%20change%20is%20increasing%20the,river%20and%20surface%20water%20flooding.>

<sup>57</sup> <https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2021>

<sup>58</sup> <https://www.conservatives.com/our-plan/conservative-party-manifesto-2019>

<sup>59</sup> [https://unchecked.uk/wp-content/uploads/2022/10/Poll\\_Unchecked\\_Deregulation\\_03102022.pdf](https://unchecked.uk/wp-content/uploads/2022/10/Poll_Unchecked_Deregulation_03102022.pdf)