A Green Future: Our 25 Year Plan to Improve the Environment; the good, the bad, and the non-committal.

The 25 Year Environment Plan set out by the Government on 11th January 2018 has been met with a mixed response by the environmental community. Its scope and ambition have been praised, both in terms of breath of issues the Plan covers and the ability for long term planning provided by the 25 year timeframe. This has set the Plan apart from previous environmental policies however, concerns have been raised that, in many instances, it does not go far enough and lacks legislative clout. Here, we highlight the best, worst, and least certain aspects of the Plan, particularly relating to those issues our members might find interesting. We have tried to concentrate on new initiatives, not those in which it is merely proposing to 'continue support for' or similar.

Governance and delivery

It was encouraging to see the Plan took on board some of the suggestions laid out in the Natural Capital Committee's (NCC) advice published in September 2017. This included the proposed establishment of a new independent body to hold government account. The Plan commits to consulting on setting up this new independent body, and on a new set of environmental principles to underpin policy-making. It is expected this consultation will be launched early 2018, and the set of metrics to monitor the progress of the Plan's implementation, which are also still to be developed.

However, the NCC suggested that the Plan itself should be given statutory footing, and while the Plan alludes to future bills (such as the forthcoming Agriculture and Fisheries Bills) and regulations (mostly to be consulted on, for instance, in reducing the use of single use plastics), it also stops short of proposing many new legal requirements. Many environmental NGOs are calling for an Environment Act to provide the legislative under-pinning to the Plan to ensure it is more than a set of ambitions.

There are still many areas the Plan is vague and non-committal on. For example:

- The Plan does not set in place 5 year reviews, instead saying there will yearly reports and periodic reviews the contents of the Plan.
- The metrics against which to assess the Plan will be consulted on, but at present are not described in detail for each aspect. The reason given for this is the adoption of a natural capital approach to the environment, which will require the development of new metrics.
- Much of the Plan relies on the voluntary cooperation of industry, if it is to be effective.
- Budgets are, for most initiatives mentioned, not outlined.

Using and managing land sustainably

When discussing sustainable land management and use, the Plan refers to a system that will use 'public money to deliver public goods', particularly in reference to agricultural subsidies. This new environmental land management system will 'incentivise and reward land managers to restore and improve natural capital and rural heritage'. According to the Plan, the aim is to 'develop a framework that works for the whole of the UK and reflects the needs and individual circumstances' of the four countries, and to work out the 'appropriate extent of the forthcoming Agriculture Bill'. Additional positive aspect within this chapter of the Plan include:

- a proposed consultation on how to embed net gain into building regulations, including on whether it should be mandatory, or remain locally controlled and advisory, as is currently the case.
- A proposed increase in wooded area of 180,000 ha by 2042 (although like for much of the Plan's aspirations the devil will be in the detail of where the woodlands are planted and with what mix of trees).
- Maintaining EU environmental standards and regulations (such as on neonicotinoids) post Brexit.
- Funding to develop a soil health metric.

However, there are concerns over the expansion of the term 'net gain' within building regulations to include other services, such as recreation, which may mean biodiversity gains are not always prioritised. In addition, government continues to drag its heels on deciding if conservation covenants will provide an effective conservation measure. The government sought expert advice on conservation covenants in 2014 (and received a draft bill), yet the Plan still only intends on 'considering' the implementation of conservation covenants.

Recovering nature and enhancing the beauty of landscapes

The ambitions of this section of the Plan include the development a new strategy for nature to tackle biodiversity loss. It will build on England's existing Biodiversity 2020 strategy in order to maintain our commitments under the Convention on Biological Diversity. The recognition of landscape-scale management in conservation was evident, particularly in the proposal for a Nature Recovery Network (NRN) of 500,000 ha. The NRN will aim to connect existing wildlife sites, and provide opportunities for species conservation and the reintroduction of native species. However, there does not appear to be a funding commitment from government for the development of the NRNs, nor a timeframe or process for how progress will be assessed. In addition, it is not clear which organisations will be responsible for the implementation and maintenance of the NRN, although it is noted that the government will work with existing National Nature Reserves to allow wildlife to 'brim over' into new areas. Finally, 'making all areas more beautiful' is also an aim of the Plan, but metrics to assess this are not clearly outlined, although are expected to be developed.

Increasing resource efficiency and minimising environmental impacts at end of life

The Plan aims to eliminate avoidable plastic waste by 2042, using measures such as reforming the producer responsibility systems to incentivise a better market for waste plastic. In addition, there is a proposal to publish a Resources and Waste Strategy in 2018 to reduce waste crime. There have been criticisms of governments slow ambitions to reduce waste. For example, no deposit return scheme for

plastic bottles is included in the Plan, despite being recommended by the Environmental Audit Committee, having the support of major supermarkets such as Tesco and Iceland, and having been shown to be a highly effective measure to increase plastic recycling in other countries. In addition, levies on items such as coffee cups, bans on plastic straws are all felt to be simple actions that could be done immediately without the need for prolonged consultation. However, the Plan indicates instead that a consultation on how single use plastics could be reduced will be launched and is expected in 2018.

Securing clean, productive and biologically diverse seas and oceans

The Plan proposes that 'science-based plans' will be used in managing fisheries post-Brexit, and that maximum sustainable yield will be sought using an ecosystem approach to management. The Plan also commits the government to reporting annually on the state of the UK's fish stocks. However, the Plan does not specifically set out how stocks of commercially fished species will be monitored, for which there is a currently a lack of data. The Plan does recognise fish stocks cannot be seen in isolation, and the marine environment needs protecting and improving. Hence, the network of marine protected areas will be extended.

Given the aspirations of the Plan for the marine environment, it is appropriate that it commits to continuing to adhere to and deliver our ambitions under the OSPAR convention. While no estimate of when this will be delivered is given, the proposal to develop a marine online assessment tool is welcomed.

This piece has not been a comprehensive list of all the ambitions of the 25 year plan for improving the environment. More was set out particularly around government's ambitions for improving the global environment and connecting more people with the environment. However, we tried to highlight some of the key issues for the ecological community. Below, we have also highlighted the key actions the Plan aims to deliver in 2018. The BES Policy Team will work on and contribute to as many of these actions as possible. It is clear that for many of the Plan's goals and aspirations that the devil will be the detail of how to meet these goals, hence the engagement of BES membership with the Policy Team is key to enabling our BES input. The policy needs to hear from you, so please contact Camilla Morrison-Bell, Policy Manager, if you can contribute to any of the consultations or calls for evidence planned for 2018:

- Consultation on a new independent body to hold government to account and a new set of environmental principles to underpin policy-making in early 2018.
- Consultation on the third tranche of Marine Conservation Zones in the first half of 2018, with designations within 12 months of that date.
- Consultation on a new environmental land management scheme.
- Consultation on a new Clean Air Strategy.
- Consultation on a National Policy Statement for water resources.
- Call for evidence on how the tax system or charges could reduce the amount of single use plastics waste.
- Developing and consulting in 2018/19 on a code and best practice guidance for assessing the merits and risks of species reintroduction projects.