

Rebecca Pow MP  
Parliamentary Under Secretary of State  
Department for Environment, Food and Rural Affairs  
2 Marsham Street, London  
SW1P 4DF

Climate Change Committee  
1 Victoria Street,  
Westminster, London,  
SW1H 0ET  
w [theccc.org.uk](https://theccc.org.uk)

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Dear Rebecca,

The Environment Act is a landmark piece of legislation that enshrines in law the Government's commitments to protect and restore the natural environment. Many of the services provided by nature not only underpin human well-being and economic activity, but are also key to societal resilience to climate change. Restoring wide-spread, ecologically rich environments is vital to ensure the health and resilience of the natural environment, and the communities dependent upon it.

A set of clear, evidence-based long-term targets for protecting and restoring nature has the potential to be a powerful driver of environmental improvement policy, similar to the role of the long-term Net Zero target under the Climate Change Act. Robust, well-designed targets for the environment are essential if the Government is to meet its obligations for nature and for climate change, as well as delivery of the sustainable development goals.

This letter offers the Climate Change Committee's views on the consideration of climate change within the draft long-term targets published by your department in March 2022. Our key points are summarised below.

**A species abundance target expressed relative to a future reference period is likely to result in a target level below the current, heavily depleted levels.**

Natural environments that are in good ecological condition are fundamentally more resilient to present and future climate and weather extremes. Species abundance and diversity underpin the flow of all benefits from nature to society, including adaptation to and mitigation of climate change. Environmental improvement targets which robustly measure the absolute health of ecosystems and their levels of biodiversity are essential for judging climate resilience as part of a long-term vision for the environment. We therefore welcome the wide-spread use of outcome-based targets across the proposals.

The proposed long-term species abundance target (a 10% improvement defined relative to a currently unknown 2030 level) does not provide a clear commitment to an absolute level of species abundance that is consistent with climate-resilience. Steep declines in species abundance since the 1970s mean the UK is one of the most nature depleted countries in the world, with 15% of its species threatened with

extinction.<sup>1</sup> The CCC's assessments show recent actions have delivered little progress in addressing the losses, suggesting that the rate of decline is likely to persist.<sup>2</sup> Expressing the target against a future level removes the urgency for action to halt the decline in biodiversity and risks a species abundance target being set at a level lower than the historically low levels we see today. **Meeting a target that would see natural ecosystems in a worse state than they are today should not be a definition of success. It would compromise resilience as well as carbon storage and be a reward for failure.** *This target should instead be set as an improvement over a recently defined baseline.*

### **Baselines and common timeframes are needed to monitor progress effectively.**

The Office for Environmental Protection has emphasised the need for a comprehensive baseline from which to monitor the condition of the environment. Progress towards the goals set out in the Government's Environmental Improvement Plans cannot be measured until a baseline is established. The current misalignment of dates across the proposed targets will also hinder the ability to monitor and evaluate overall progress. To support a comprehensive environmental baseline, *alignment is necessary across the proposed reference years, target years and interim milestone dates for all the targets.*

### **There are critical gaps in the extent and scope of the proposed targets.**

Improving the health of UK soils is key to meeting all other targets: Without soils in good health, climate impacts such as floods and droughts will compromise carbon storage in the natural environment and its ability to deliver vital benefits, such as those to agriculture. However, the proposals contain no targets related to soil health, despite this being one aspect of the natural environment highly vulnerable to climate change. *An ambitious soil health target should be included as a priority in the Government's forthcoming Soil Health Action Plan.*

Omitting a condition target for Protected Areas from the current proposals significantly weakens the Government's ability to meet its overarching biodiversity goals: Protected sites are home to much the UK's biodiversity, including many critical species which are limited to these areas. The ecosystems in protected areas are key stores of natural carbon and provide protections against acute climate impacts including flooding and droughts. They have the potential to support the achievement of key Government targets, particularly for species abundance. Despite this, protected areas are often in a badly degraded state. Protected sites are one of only a few available measures of habitat condition making them crucial to effective monitoring of progress. To reflect their importance to improving species recovery, *a target to improve the condition of Protected Areas should be included in the proposals.*

The target to create or restore in excess of 500,000 hectares of 'wildlife-rich habitats' must specify and prioritise the different habitat areas it covers: Not specifying the type and extent of particular habitats that need to be restored (such as salt marshes, ancient grasslands, peatlands and flood plain meadows in addition to native woodlands) risks overlooking some of our most important habitats, including those particularly vulnerable to climate change. The condition and connectivity of the habitats created and restored are also not defined in the proposals, making

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<sup>1</sup> Hayhow et al, (2019) The State of Nature 2019. The State of Nature partnership. <https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf>

<sup>2</sup> CCC, Progress in adapting to climate change 2021 Report to Parliament. <https://www.theccc.org.uk/wp-content/uploads/2021/06/Progress-in-adapting-to-climate-change-2021-Report-to-Parliament.pdf>

them inconsistent with the principles set out in the Lawton Review (2010)<sup>3</sup>, which state that habitats need to be in good condition, bigger, and more connected in order to have a greater chance of allowing the species they support to adapt naturally as the climate changes. *The target should specify the types and extent of habitats covered, and clearly define the condition and connectivity, including in relation to Protected Areas, of the ecosystems they support.*

**The woodland creation target should reflect the full range of ecosystem services supported by these habitats.**

The sustainable management of woodland is vital for ongoing carbon sequestration, biodiversity and climate resilience. The woodland creation target is in line with the level of ambition needed to deliver the 2050 Net Zero target. However, Woodland creation projects that fail to consider biodiversity and the ecosystem services they support risks creating woodlands that are not resilient to climate change, with a high risk of impermanence. Furthermore, *new woodland must not be established on other critical native ecosystems, in particular peatland and ancient grassland.*

Ensuring woodlands are under active adaptive management is key to addressing this. Interventions to increase resilience are characterised by increasing species and genetic diversity, planting or restocking with species better able to cope with future climatic conditions, and converting to continuous cover systems of management. *An additional target for the area of woodland under sustainable management in England should be added to the existing set to address this gap.*

**Putting water demand targets on a statutory basis is welcome, but ambition needs to be strengthened to ensure climate resilience.**

The draft Environment Act target puts several previously-stated targets on a clear statutory footing and extends the scope to include non-household water uses – providing a fuller coverage of the overall use of water resources. The proposed water demand target is aligned to existing ambition for public water efficiency through to 2050. Evidence summarised in the Third UK Climate Change Risk Assessment indicates that additional adaptation beyond these existing ambitions is required to avoid supply-demand deficits in parts of England, particularly in the late century and under higher warming scenarios, and will need to be complemented by planning for additional supplies and connectivity between different water regions. Defining the target in terms of per capita consumption means large population growth will undo environmental gains – an overarching absolute target would manage this risk. The proposed demand reduction target applies only to public water supplies, excluding non-public water supply abstractors who contribute approximately 7% of all water consumption. *Demand reduction targets should be extended to larger non-public abstractors whose use can be significant in some catchments.*

**Setting a statutory target to reduce residual waste is welcome, but a target to improve resource efficiency is also needed.**

The proposed target to reduce residual waste by 50% by 2042 is an important step, and the Government should consider clarifying intermediate targets towards this goal. However, the overly narrow scope of the target means it will not drive many of

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<sup>3</sup> Lawton, J, L, (2010) Making Space for Nature: A review of England's Wildlife Sites and ecological Network.  
<https://webarchive.nationalarchives.gov.uk/ukgwa/20130402170324/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf>

the most substantial resource efficiency savings discussed in the Resources and Waste Strategy and the Net Zero Strategy. These include approaches that reduce demand for new steel and cement. A presumption against demolition and for refurbishment would make an important contribution to this. The Government has stated that it is considering a target to improve wider resource efficiency – we support an additional target to ensure there is a broader effort on reducing emissions from manufacturing and construction. *Noting the intention to exclude Anaerobic Digestion from this target, the Government should also consider setting an appropriate target to reduce food waste into law.*

**The relationships between the target proposals and other Government policies must be made clearer.**

Delivering on the Environment Act ambition, against the background of a changing climate, requires a coordinated approach across these targets and with other policy areas. Ensuring the levels set for England are appropriate for the UK as a whole makes close collaboration with the devolved administrations essential. An integrated response to climate change, the environment and food provision is needed for success to be achieved within any one of these areas. To achieve this, the many benefits of the proposed outcome-based targets must be clearly linked to the suite of climate and environmental policies that support them, in England and across the devolved administrations. Defra has yet to set out how the Environmental Improvement Plans, the Environmental Land Management (ELM) schemes and the various policies for trees, soils and nature will fit together under the Environment Act targets.

The CCC welcomes the Government's commitment in its recent Food Strategy for Defra to publish a land use framework in 2023. The proposed framework should clearly outline how the multiple targets in individual policy areas relate to each other and to existing commitments in national legislation and internationally, in order that they become mutually supportive and deliver synergistic impacts.

Yours sincerely,



Lord Deben  
Chairman, Climate Change Committee



Baroness Brown  
Chair, Adaptation Committee