



Environmental Targets At Last – What's Changed?

What's changed?

In March 2022, the government made a consultation on environmental targets. These are relevant for the UK, not only because they're legally binding, but because, as the government pointed out in its original consultation, they will “allow for objective scrutiny and accountability of the government’s progress to society.”

On Friday 16 December 2022, over six weeks after the statutory deadline as set out in the Environment Act 2021, the government published the long-awaited response to its environmental targets consultation. This contains the final version of these legally binding targets. The next step is for the government to publish an Environmental Improvement Plan, which is legally required in January 2023.

Green groups have already voiced their opinions on these new environmental targets, and have qualified them as providing “[very little change](#),” being “[weak and unambitious](#),” and being only a “[job half-done](#).” While we don't take the same stance as these green groups, we understand their frustration, as very few of the changes proposed by the consultation respondents were implemented.

The main question is, what's the difference between the targets proposed in the consultation (March 2022) and the final targets (December 2022)? We highlight the main changes and provide a brief overview of relevant matters concerning these targets.

Biodiversity on land

Target: 2030 and long-term species abundance target

Target proposed in the consultation: increase species abundance by at least 10% by 2042, compared to 2030 levels

Final target: ensure that species abundance in 2042 is greater than in 2022, and at least 10% greater than 2030

1. Main change: baseline for comparison

The decision made about the abundance in 2042 to be more than 2022 is positive. There was concern that the original wording would allow the target to be fulfilled, even if the level of species abundance was lower in 2042 than today. This would happen if species abundance declined from today to 2030, because the baseline for comparison was 2030 and not 2022. The new wording provides a protection against that risk.

2. Main discarded proposal: request to increase level of ambition

Many respondents asked the government to increase the percentage in species abundance, but they disagreed. While this refusal is not negative by itself, we're concerned about the reason given, because the government said “increasing ambition in this way is not supported by our extensive evidence base. These targets are already challenging, and it's important that we set an achievable level.”

3. Other discarded proposals: individual species or average?

We provided a response to the consultation, flagging that the government hadn't made it clear if the 10% target is for individual species or an average across all of those monitored. If the aim is to increase an average, this would fall short of securing an increase in biodiversity. Unfortunately, this flag wasn't taken into consideration in the final target.

Target: long-term species extinction risk target

Target proposed in the consultation: improve the England-level Great Britain Red List Index for species extinction risk by 2042, compared to 2022 levels

Final target: improve the Red List Index for England for species extinction risk by 2042, compared to 2022 levels

1. Main change: no change

The target remains the same. While the final target now refers to a “Red List Index for England,” this is the same document as the one mentioned in the proposed target.

2. Main discarded proposal: species in risk of extinction

Several responses requested the government to also include an indicator for species in risk of extinction. However, they considered that “changes in an extinction risk category for a specific species require significant improvements in the condition of the species population. Therefore, modest improvements in the overall target indicator reflect significant reductions in extinction threat.”

3. Other comments: criticism to the Red List Index for England

The current index is limited to a small number of species groups, and assessments are carried out on a very limited basis. We believe the index would need to be improved for example by using the IUCN Red List model to assess “Green Status.”

Biodiversity on land

Target: long-term wider habitats target

Target proposed in the consultation: create or restore in excess of 500,000 hectares of a range of wildlife-rich habitats outside protected sites by 2042, compared to 2022 levels

Final target: restore or create in excess of 500,000 hectares of a range of wildlife-rich habitat outside protected sites by 2042, compared to 2022 levels

1. Main change: no change

The target remains the same.

2. Main discarded proposal: net increase

The Royal Society for the Protection of Birds campaign and the Office for Environmental Protection (OEP) made a specific request to make the target a “net increase.” However, this was rejected by the government, who alledged there isn't enough data to fully account for habitat lost.

Biodiversity in the sea

Target: Marine Protected Areas (MPA) target

Target proposed in the consultation: 70% of the designated features in the MPA network to be in favourable condition by 2042, with the remainder in recovering condition, and additional reporting on changes in individual feature condition

Final target: 70% of the designated features in the MPA network to be in favourable condition by 2042, with the remainder in recovering condition

1. Main change: additional reporting removed

There will be no more additional reporting on “changes in individual feature condition.” Although, the government said that it will still undertake additional reporting “on the extent to which pressures have been removed from MPAs, as part of our assessments into those features in a recovering condition.”

2. Main discarded proposal: halting damage by 2024

The OEP recommended an additional target focused on halting damaging activities by 2024. The government refused this proposal because “the target to achieve favourable condition by 2042 is predicated on halting damaging activities by 2024.” The reason for this refusal is strange, because the government still agrees that damaging activities should stop by 2024. We believe this is a missed opportunity from the Government to take further steps for protecting the MPAs.

Improve water quality and availability

Target: abandoned metal mines target

Target proposed in the consultation: reduce the length of rivers and estuaries polluted by target substances (cadmium, nickel, lead, copper, zinc, arsenic) from abandoned mines by 50% by 2037 against a baseline of around 1,500km

Final target: halve the length of rivers polluted by harmful metals from abandoned mines by 2038, against a baseline of around 1,500 km

1. Main change: harmful metals

The original wording referred only to 6 polluting metals, while the final target refers to all “harmful metals.” This is positive as it effectively expands the list of target substances.

2. Other change: new deadline – 2038

In all the final targets, the reference to the date of compliance was changed to 2038 instead of the original 2037.

3. Main discarded proposal: increase in target ambition

The government refused increasing the ambition, alleging that “this would not be feasible given significant additional funding required, supply chain constraints and long lead-in times to secure the additional capability and to plan schemes. Ultimately, the additional costs would reduce the cost-to-benefit ratio.”

4. Other comments: other mine impacts not taken into consideration

The pollution from a typical abandoned mine impacts not only river water, but also sediments, groundwater, and soil. We consider that not including these will only provide a partial picture of reality.

5. Other comments: double counting pollution removal

The consultation document in the proposed target provided “in addition to reporting the decrease in polluted river length, we will gather data on the amount of metals captured in mine water treatment sites operated by the Coal Authority under the WAMM Programme. Prevention of these substance being discharged into rivers will provide further data and evidence in support of achieving the proposed target.”

This wasn't mentioned again in the latest government response. We understand this means that the government will go ahead with that proposal. We disagree with this, as it would involve double counting the pollution remediation (once in the source and again in the affected media).

Improve water quality and availability

Target: nutrient pollution from agriculture target

Target proposed in consultation: reduce nitrogen, phosphorus and sediment contribution from agriculture in the water environment by at least 40% by 2037 against a 2018 baseline

Final target: reduce nitrogen (N), phosphorus (P) and sediment pollution from agriculture into the water environment by at least 40% by 2038, compared to a 2018 baseline

1. Main change: “pollution” instead of “contribution”

Only this one word changed in the final target. The concept of pollution is different and narrower than contribution. In general terms, pollution only occurs when a certain threshold is exceeded. The government’s response didn't explain the reason for this change. We hope further clarification will be provided.

2. Other change: new deadline – 2038

In all the final targets, the reference to the date of compliance was changed to 2038 instead of the original 2037.

3. Main discarded proposal: increase/decrease in target ambition

The government refused increasing or decreasing the ambition, because an increase would impact food production, while a decrease would impact the water environment.

Target: nutrient pollution from wastewater target

Target in consultation: reduce phosphorus loadings from treated wastewater by 80% by 2037 (against a 2020 baseline)

Final target: reduce phosphorus loadings from treated wastewater by 80% by 2038 against a 2020 baseline

1. Main change: no change

The target remains largely the same.

2. Other change: new deadline – 2038

In all the final targets, the reference to the date of compliance was changed to 2038 instead of the original 2037.

3. Main discarded proposal: reducing nitrogen levels

The government refused to expand the target to include nitrogen because “further research is needed into the links between elevated nitrogen levels and eutrophic impacts in rivers nationally.”

Target: water demand target

Target in consultation: reduce the use of public water supply in England per head of population by 20% by 2037

Final target: reduce the use of public water supply in England per head of population by 20% from the 2019/2020 baseline reporting year figures, by the end of the reporting year 2037/2038

1. Main change: baseline for comparison

While the new target specifies that the baseline for comparison is 2019/2020, the target remains largely the same.

2. Other change: new deadline – 2038

In all the final targets, the reference to the date of compliance was changed to 2038 instead of the original 2037.

3. Main discarded proposal: change in proposed metric

A change in metric was requested because there was a concern that if the population increases, we may achieve the target even if total demand on water from the environment has increased. The government refused this change because “it indicates the level of water used per person in England per day, making it relatable to water users. It will help to measure and improve water efficiency trends over time.”

Woodland cover

Target: tree canopy and woodland cover

Target proposed in consultation: increase tree canopy and woodland cover from 14.5% to 17.5% of total land area in England by 2050

Final target: increase total tree and woodland cover from 14.5% of land area to 16.5% by 2050

1. Main change: target reduced to 16.5%

The target for woodland cover was reduced from 17.5% to 16.5%. The reason given by the government for this change is that this “is in line with our commitment in the 25-year environment plan to increase woodland cover from 10% to 12% of land area by 2060, but with an expanded scope to include all trees rather than conventional woodland and brought forward to 2050 to align with the net zero strategy.”

2) Main discarded proposal: increase target ambition

The change went against the requests of a considerable number of respondents that actually requested to increase the target. In our response, we provided that in a paper published by Woodland Trust in January 2020, the Committee on Climate Change recommended a target of 19% woodland cover by 2050 if the UK is to meet its commitment to net zero by 2050.

Resource efficiency and waste reduction

Target: reduce residual waste target

Target in consultation: reduce residual waste (excluding major mineral wastes) kg per capita by 50% by 2042 from 2019 levels

Final target: reduce residual waste (excluding major mineral wastes) kg per capita by 50% by 2042 from 2019 levels. This will be measured as a reduction from the 2019 level, which has been revised to 574 kg per capita following updated evidence postconsultation

1. Main change: baseline for comparison

While the new target specifies that the baseline for comparison is the 2019 level, the target remains largely the same.

2. Main discarded proposal: separate target for plastics

The suggestion was refused by the government as it considers that the “target is holistic and will reduce all residual waste, including plastics.”

Air quality

Target: annual mean concentration

Target proposed in consultation: annual mean concentration target – a PM2.5 target of 10 micrograms per cubic metre (μg per m^3) to be met across England by 2040

Final target: an annual mean concentration target for PM2.5 levels in England to be 10 μg per m^3 or below by 2040.

1. Main change: no change

The target remains largely the same.

2. Main discarded proposal: increase target ambition to 5 μg per m^3

The OEP and other respondents suggested the target of 5 μg per m^3 , as provided in the World Health Organisation Guidance. The government refused this suggestion, alleging that 6–8 μg per m^3 of the 2018 levels of PM2.5 people experienced in parts of southeast England didn't come from man-made sources from the UK. Therefore, a 5 μg per m^3 target would be impossible to achieve.

3. Other discarded proposal: earlier compliance year for different areas

The OEP and other respondents suggested that the 10 μg per m^3 target was achievable by 2030 in most parts of the country. This means that it would be more useful to have targets that are specific to local areas. The government refused this suggestion, alleging that the targets are set for England as a whole, and according to their modelling this could only be achieved by 2040.

In our opinion this was a missed opportunity, as the creation of targets specific to local areas doesn't contradict the general target. It also seems inconsistent that the government is in favour of the inclusion of individual catchments alongside the national nutrient pollution target, but is against a local approach for air pollution.

Target: population exposure reduction

Target proposed in consultation: population exposure reduction target – a 35% reduction in population exposure to PM2.5 by 2040 (compared to a base year of 2018)

Final target: a population exposure reduction target for a reduction in PM2.5 population exposure of 35% compared to 2018 to be achieved by 2040

1. Main change: no change

The target remains the same.

2. Main discarded proposal: increase target ambition

The majority of the respondents called for greater ambition in the target. The government refused increasing the ambition alleging that “the metric and level of ambition have been determined following an evidence-based process, with input from industry and internationally recognised experts, to determine a target which is stretching but achievable, and focuses on health outcomes.”

Key contact



Claire Petricca-Riding

Partner

+44(0)1612 591 667

+44(0)7867 681 990

Claire.Petricca-Riding@IrwinMitchell.com

Expert Hand. Human Touch.

 0370 1500 100  irwinmitchell.com  @IrwinMitchell

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