

Response to the EAC consultation on the 25-year Environment Plan

1. The Renewable Energy Association (REA) was established in 2001 as a not-for-profit trade association, representing British renewable energy producers and promoting the use of renewable energy in the UK. REA helps our members build commercially and environmentally sustainable businesses whilst increasing the contribution of renewable energy to the UK's electricity, heat, transport and green gas needs.

2. Its membership also includes composters, following the merger of the Association for Organics Recycling (formerly the Composting Association) in 2013. The REA endeavours to achieve the right regulatory framework for renewables and organics waste recycling to deliver an increasing contribution to the UK's electricity, heat, recycling and transport needs

To what extent does the Plan set a sufficiently ambitious agenda across Government? How far do the objectives, targets and indicators set out in the plan reflect a higher level of ambition than existing targets (including European Union targets and the Sustainable Development Goals) and current performance? Are there any major gaps?

3. The REA welcomes the long-term approach of a 25 Year Plan and its ambitious intent to "build on our reputation as a global leader in environmental protection" as stated by Environment Secretary of State Michael Gove. The REA recognises that it is important that goals and objectives are treated as a long-term strategy and not seen as something that will exist solely for the duration of the existing Government. Continuity across successive administrations is important as well as across the devolved administrations.

4. There are currently a number of EU driven targets incorporated into the Circular Economy Package which relate specifically to biowaste. The Commission has proposed a provision for the separate collection of bio-waste. Amendments will include replacing the Directive on Waste's Article 22 so it reads as follows: *'Member States shall ensure the separate collection of bio-waste where technically, environmentally and economically practicable and appropriate to ensure the relevant quality standards for compost and to attain the targets set out in Article 11(2)(a), (c) and (d) and 11(3).* The TEEP clause has raised concern as this is the past has been used as an excuse for not being able to comply with a Directive based on economic grounds, there is no mention of TEEP within the plan which is an improvement on the current EU position.

5. Albeit an ambitious agenda has been set within the 25-year plan, there is little reference to the delivery mechanism which will track the performance of this plan or the resources that will ensure its ultimate delivery.

What would success or failure look like for the Plan? To what extent will the Government's proposals for reporting on the Plan allow for proper scrutiny of its performance against its objectives? Are the commitments to legislative action in the Plan sufficient to ensure it will endure beyond the current Parliament?

6. The vision, ambition and trajectory of the plan are laudable, however, it is lacking in detail in a number of areas and fails to provide the information required to give confidence that this is more than just words. There is little mention of the policies or actions which are required to underpin such an ambitious plan and it reads more like an analysis of the challenges faced rather than a plan to address the issues.

7. A measure of success will be demonstrable financial growth within the waste and resources sector and a reduction in the volume of materials that are incinerated or buried as we are knowingly currently burning or burying in excess of 8MT of food waste that could be much better utilised. Improved environmental stewardship within the agricultural community combined with a reduction in pollution incidents from across the wider spectrum of commerce and industry would also be tangible measures which would demonstrate success.

8. Soil Health:

In respect to improving soil health which is a significant issue within the UK, there is mention of developing a Soil Health Index and ending the use of peat in horticulture. This latter initiative has been tried in the past with voluntary agreements for a 'Peat reduction target' but these have never materialised. What will be different this time and what levers will be used to change commercial growers' reliance on peat-based materials as a growing media?

9. Under the section titled "Using resources from nature more sustainably and efficiently," the plan speaks about developing appropriate 'soil metrics' and management approaches in the future but offers no details as to what these are. It is widely recognised that our soil health has deteriorated in recent years as a result of intensive farming practices. Soil organic matter has been reduced significantly with less livestock on the land and we have a noteworthy opportunity to return organic matter to land through the addition of compost and manures which will in return improve soil health, fertility and the biodiversity within our soils at a national level and organic matter could also be used as a measure of success in respect to one aspect of soil health.

10. The addition of humus to soils from compost also aids in the binding of soils which reduce soil erosion which is more commonplace as organic matter depletion takes

place. It is important that the farming community is fully integrated, encouraged and rewarded for supporting sustainable farming practices that promote the use of biodegradable resources.

11. Composting sector:

We currently have a buoyant composting sector within the UK which manufactures in excess of 5 million tonnes of compost including a wide range of growing media products and soil improver for the farming community. The biodegradable management sector has the capability to manufacture significantly more compost (and digestate) from AD if more feedstock was made available through a mandatory food waste collection plan as has been carried out in Scotland and in Wales. This would not only create employment but make much better use of this resource rather than putting it in landfill or into incineration. The plan states '*Maximising the value and benefits we get from our resources, doubling resource productivity by 2050*' but it does not make any reference as to how this may be achieved in the future.

12. Targets on measuring the success of enhancing and protecting our natural capital can be carried out through tracking the growth of different wildlife habitats from our forests through to the extensive farmland and also tracking the biodiversity contained within these different ecosystems.

13. Sustainable Artificial fertiliser replacement:

Compost and digestate (from AD) provide an excellent source of partial or full fertiliser replacement within the farming sector. These sustainable replacements need to be encouraged more through incentive schemes to farmers. There is mention of 'working with industry to encourage the use of low-emissions fertiliser' but no mention how this might be carried out in the future.

14. Residual Waste Management

In regards to waste management, the Plan makes some positive announcements that highlight the need for a more comprehensive strategy to deliver a circular economy in the UK. The commitments suggest Government thinking is moving in the right direction, with announcements in regards to the Framework for Greater Consistency and reforming the Producer responsibility systems being particularly welcome. It is also encouraging to see a specific reference to Government intending to explore different infrastructure options for managing residual waste in the production of biofuels for transport. Technologies like gasification could play a key role in decarbonising the transport sector.

15. However, like much of the plan, there is a lack of detailed policy intent on how these ambitions are to be delivered. It is clear that a lot of this detail will now depend on what is included in the Waste and Resource Strategy, currently being

developed by DEFRA and the Bioeconomy Strategy being developed by BEIS. We would encourage the Environmental Audit committee to press the Government on how they are bringing together these separate strategies to deliver firm policies that will deliver their stated ambitions. There is understandable concern that with a number of welcome Plans and Strategies coming out of Government that they are being developed in silo, through separate departments, without clear end objective being used to guide their thinking.

16. Further to this we would encourage the Government to pay specific attention to the Waste Infrastructure Study being conducted by the National Infrastructure Commission, which includes modelling the quantity and nature of what the UK will see arising in the waste sector up to at least 2030. This work, which has already been done in conjunction with industry, should feed directly into the development of further strategies and policies.

Implementation

The Plan sets out a natural capital-led approach and a principle of “environmental net gain” when undertaking development. What are the risks and benefits of adopting these approaches? What steps need to be taken during development and implementation to ensure they lead to positive environmental outcomes, especially in respect of biodiversity?

17. It is very important that any development in this area is widely consulted with industry in a proactive manner so that their views are taken into consideration as it will be only through their actions that change will happen. The industry does not require any further regulatory burden placed on them which will lead to slow down in investment and growth. Government needs to take responsibility for ensuring that the targets are clearly defined and provide sufficient resources to deliver against these targets. We have seen a significant reduction in resources within the EA in recent years which has not assisted them in combating illegal activities within the waste and recycling sector.

To what extent does the Plan set out effective delivery mechanisms to ensure DEFRA, other Government departments and public bodies have the resources and responsibilities to implement it? Where should the Government seek agreement with the Devolved Institutions to ensure a common approach across the UK?

Resource capability:

18. It is not clear as to the delivery mechanism which will make all of the ambitious goals happen. It is recognised currently that with all the pressures exerted on Government resources on account of the Brexit negotiations that getting delivery on such a wide range of issues will not happen with the current resource. The Environment Agency which has a major role to contribute in the delivery of the 25

Year EP is severely under-resourced and this needs to be addressed as part of the plan if delivery is to happen within the agreed timescale. A concerted effort to work with the devolved administrations so that there is a level of consistency and uniformity would be beneficial to those that work across these borders.

Principles and Oversight

The Government has proposed an independent statutory body to "champion and upholds environmental standards as we leave the European Union". What role, legal basis and powers will it need to ensure the Government fulfils its environmental obligations and responsibilities? How do these compare to the role of the European Institutions in the existing arrangements? What standard would it have to meet to be "world leading"?

19. The REA welcomes the suggestion that there is an Independent body to champion environmental standards; however it does question the existing regulator's role as they should be carrying out this duty already as the principal protector of the 'Natural Capital', so it is not clear how a newly appointed body would differ and what their responsibilities would include. Further questions also include looking at how the new body is to be funded and will it result in a duplication of effort?

20. The waste and resources sector is already sufficiently regulated and what we wish to see is greater emphasis on regulating the poor performers and those that pollute rather than the responsible operators within the sector as they do not require any additional cost burden if they are to prosper and grow within the Circular Economy.

21. There needs to be a connected or joined-up approach to all the activities that are discussed within the plan as none of them can work in isolation. Policies which impact on for example the collection of food waste will have a direct link to improving soil health through an increase in the production of sustainable organic fertilisers which will improve our denuded soils and improve the organic matter within our soils on a national level. In addition, through the use of more sustainable fertilisers, this will improve the quality of our watercourses with reduced nitrate leaching and reduction in water quality within our natural aquifers.

22. As mentioned above, the EA's existing role needs to be examined as they are the principal regulator and have the powers to act. If they were better resourced, it may not be necessary to have an additional resource to carry out this work as the EA are sufficiently well qualified. In addition, however, oversight from the Environment Audit Committee (EAC), and the Environment Food and Rural Affairs Committee (EFRA) is welcomed as they provide greater transparency to the process.

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