

THE SOCIETY FOR THE ENVIRONMENT (SOCENV) SUBMISSION  
TO  
THE ENVIRONMENTAL AUDIT COMMITTEE  
ON  
FUTURE OF THE NATURAL ENVIRONMENT AFTER THE EU REFERENDUM INQUIRY

## Introduction

1. The Society for the Environment is a Royal Chartered umbrella body made up of a partnership of 24 professional bodies. Our licensed partners represent over 550,000 professionals between them and operate across many disciplines. Their members are practitioners in environmental and natural resources management ranging from chemists and engineers to ecologists and biologists, from front end delivery to the very highest levels of leadership. Our Royal Charter grants us the responsibility to oversee the registration of the Chartered Environmentalist qualification, of which there are over 7,000 registered professionals, as well as the more recently launched Registered Environmental Technician qualification.
2. The Society has already announced an initial framework for responding to Brexit and we will be developing this. Any changes to the way in which the agri-environment works should be tested against these principles, which are:
  - The Society recognises that our Nations face a challenge in moving forward in the wake of the decision to leave the European Union. As members of the European Union, we have made significant progress with the quality and quantity of our natural resources over the last 40 years. The Society wish to help protect that progress and maintain it going forward. But, we believe that there is the now the opportunity to enhance environmental mitigation and protection.
  - Excessive bureaucracy can be inimical to the objectives of legislation. So we would be pleased to work with the Government in finding ways and means of transposing national legislation made in pursuit of European Union legislation into purely UK driven legislation, which sustain the objectives but which are at the same time efficient and effective. It is essential that this wisdom is applied to new legislation in future. This will add additional impetus to current efforts for better regulation and the work of the Regulatory Delivery team in the Department of Business, Energy & Industrial Strategy. However, we urge the Government not to deregulate essential environmental and natural resources management.
  - Threats to our natural resources do not recognise national boundaries. For the last 40 years, the UK has shared wisdom with Continental colleagues in pursuit of better environmental standards across Europe. The Society will continue maintain our European contacts. We urge the Governments of the UK to also continue conversing with their colleagues from across the EU and striving for the betterment of Environmental standards.

- Because of the international nature of environmental and natural resources management, we have believed that it must be a key component of pan-European policy. This is our description of the Policy which recognises that the UK is part of the 'Great European Project', but as an independent nation and not part of the EU. The objectives shared with the EU and other components of Europe must be in pursuit of the highest principles of individual and environmental wellbeing which transcends the needs of a common trading agreement.
- The Society will continue to pursue our European partnerships on that basis and we would be pleased to assist the Government in helping to maintain relationships between environmentalists and decision makers across the EU.
- The relationship of the UK with the EU has been a Reserved Matter which has restricted the flexibility of devolved administrations to implement appropriate national legislation. We believe that appropriate devolution of environmental and natural resources legislation to better approach issues at a more local level would be beneficial and will be a key component of the way forward.
- We recognise that the result of the EU referendum highlighted a need to re-engage with communities in decision making, in order to replenish their trust in experts, governments and decision making bodies. The wellbeing of society is paramount to a thriving economy. With this in mind, we would welcome an opportunity to discuss potential models for to promote wellbeing, such as the Welsh Wellbeing of Future Generations Act, and how that might be adapted to strengthen community resilience across the UK.
- Our preferred structure for political leadership of confronting climate change is that there should be a distinct position within the Cabinet, but we can see opportunities for the new Department of Business, Energy and Industrial Strategy (DBEIS) in embedding climate change awareness and action for adaptation and mitigation at the highest levels in business.
- The creation of a link between climate change and business must be beneficial and DBEIS is well placed to properly embed climate change policy within the UK 's Industrial Strategy and to help develop a sustainable circular economy and promote proper natural resource management. We call upon DBEIS to honour the commitments made by the former Department Energy and Climate Change.
- There are number of Corporate and Director codes on governance; we would like to see these revised to ensure that those in a position of power, wherever and whatever that might be, will act in the best interests of our future on sustainability.

### **Summary of key points**

3. The Society recognises that there are numerous opportunities for the UK to develop agri-environment policy so that is effective environmentally and economically and delivers better value for money than current European systems.

4. The management of the agricultural environment should be a leading and integral part of integrated natural resources management, NRM, based preferably on catchments, with overarching policies set at the devolved and UK levels
5. Good agri-environmental policy can benefit more than just farmers. We believe that agri-environment policy should also reward small and medium enterprises (SMEs) and landowners for good environmental practice and that systems limited to agriculture could be expanded.
6. We call for an evidence based and expert lead approach to development of any new agri-environment policies, laws and regulations.
7. We urge Government to maintain and enhance current environmental protection, whilst reducing burdensome bureaucracy.

## **A General Overview**

8. One of the challenges with the current system is that the administration of the environment, including agri-environment CAP schemes has tended to be in silos in spite of green incentives in the schemes.
9. It makes sense to have an integrated approach based on the needs of relatively local areas. This concept is described best as natural resources management in which broad policy is set at national level but execution is determined at a local level. It might well be in the future that national policy making comes in two levels – at UK level and at a devolved level.
10. For local execution, the most logical area is the river catchment. They are natural environmental engines, which are intertwined with many other key factors, such as microclimates, human activities, landscape and so on. They will be the basis for integrating agri-environment schemes, rural development plans, local responses to improving the state of nature, identifying and managing protected sites, the Water Framework Directive, managing forests, fisheries, hydropower, land drainage and flood risk, water resources and recreation and access. Catchments as a logical basis for managing other environmental issues, such as waste and air quality. These are best suited to serve local needs.
11. But that does not cover all aspects of managing natural resources, for example the requirements of landscapes, national parks, forests and even river basins transcend the immediate requirements of a catchment, and catchments might cross local authority boundaries or agri environment schemes or Rural Development and Shoreline Management Plans. Catchments need to fit together in mosaic to serve this greater perspective. So a catchment based NRM plan should have within it internal local needs and external elements, which when fitted together with external elements from other catchments combine to form plans for those wider external needs. This is best illustrated by thinking of catchments as vertical columns connected by a series of horizontal, cross-cutting plans and needs.

## A MODEL FOR CATCHMENTS AS A BASIS FOR NRMAs

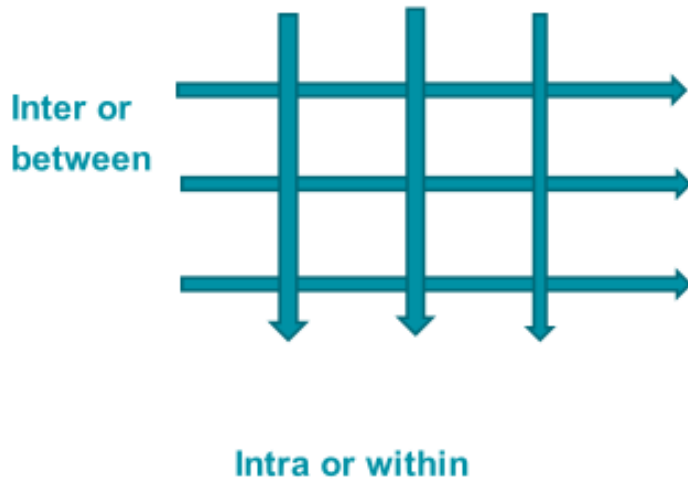


Figure 1 Model for catchments as a basis for natural resource management areas.

12. So the answers to the questions should be evaluated against this broader concept rather than just the 'silo' of agri-environment schemes.

### Answers to the specific questions with the concept of NRM in mind

*What are the implications for UK biodiversity of leaving the EU, in particular the Common Agricultural Policy?*

13. One of the key implications for UK biodiversity from the UK leaving the EU would be the removal of the Green incentives from the transposition of rules derived from Common Agricultural Policy to UK driven rules and the removal of regulations derived from the Birds and Habitats Directives which are the only environmentally relevant rules not tied into the Single Market. But we recognise the international commitments by the UK under the Berne Convention for the Conservation of European Wildlife and Natural Habitats. There is also concern over the status of a number of other EU driven rules and regulations which directly and indirectly affect the environment, but which are linked to the Single Market.

*To what extent do initiatives to support biodiversity in the UK depend on CAP-related payments?*

14. Within the concept of NRM there are several opportunities to protect and enhance biodiversity. A very good example is the work of Natural Resources Wales. It is important to remember that CAP schemes embrace woodlands as well as agriculture, but woodland and forest management is substantial outside of CAP. The management of our rivers is crucial to biodiversity. We must focus on agriculture and woodlands as being key. but not sole, parts of natural capital and natural income and functioning on the principles of ecosystem services. We need to understand how agriculture will add to Green Growth and the Green Economy and would be pleased to elaborate

its views.

*What risks and opportunities could developing our own agri-environment policy and funding present?*

15. Participants contributing to workshops for the Review of the Balance of Competences between the United Kingdom and the European Union Environment and Climate Change noted that EU legislation took a uniformed approach across the EU and this hindered flexibility, especially for SMEs. A cause of this inflexibility was the aspirational nature of EU target setting, as opposed to evidence based goals. The development of a home-grown agri-environment policy can take into consideration the needs of all players including SMEs in the sector and either reduce, or reassign, burdensome bureaucratic and reporting tasks whilst upholding required regulation. This also provides the opportunity for a more regional and local approach to the creation of agri-environment policy, with the different needs and requirements of different regions being more accurately represented.
16. The creation of a new British agri-environment policy allows for the embedding of sustainable intensification and the circular economy within the heart of how British agriculture operates. Where the Department for Business, Energy and Industrial Strategy now has the capability to align climate change mitigation and the circular economy with the industrial strategy, so does the Department for Environment, Food and Rural Affairs now have the capability to align positive environmental measures within its agri-environmental policy. With a dedicated department for industrial strategy, we envision a Britain in which DEFRA can work closely with DBEIS to ensure the agricultural sector is brought in line with an overall industrial strategy. A key opportunity for this would be in the realm of innovation, where there is already significant development (such as in sensor platforms and sensors, control software and autonomous tools) in methods to make an increase in agricultural intensification and load more sustainable. There is a role to play in many other sectors in making Britain's agriculture productive and profitable for decades to come.
17. A strong agri-environment policy, based upon sustainability, research, innovation and the application of environmental knowledge will yield fruits that can be exported abroad. For example, there is scope for the Department for International Development to utilise knowledge and lessons learned from our own agricultural sector and apply it to developing countries. Innovative technology can be sold elsewhere.
18. There is the opportunity to ensure that any policy which related to funding or subsidies provides value for money. Where it would be more effective for the Government to step in to provide environmental protection, instead of paying farmers to do so themselves, then there should be no impediment to do so as to reduce long term costs and environmental degradation.
19. Many of our partner organisations support the 'polluter pays principle' and advocate for a shift towards punishment over incentives. This may provide impetus to SMEs to ensure that they do not fall foul of the law, but not provide sufficient incentive for them to go beyond basic environmental protection and it requires a comprehensive set of laws and effective enforcement. There is also the question of whether the punishment would fit the crime or fit the organisation committing it,

as small fines may not deter large enterprises. Herein lies the risk that environmental protection policy is not relevant to all those operating in the sector.

20. SocEnv calls for all policy, legislation and regulation to be based upon extensive research and sound advice. There is the risk that in the haste to replace mechanisms lost by leaving the EU, flawed initiatives and directives are replicated and mistakes remade. With the Government pledging to continue CAP payments until 2020, there should be time to thoroughly research, draft and implement a replacement that works for the agriculture sector and for the environment.

*How should future support for UK agriculture be structured in order to ensure there are incentives for environmentally-friendly land management?*

21. It should be structured within the concepts of natural resource management. Hence this will need closer working between the Environment Agency, Natural England and the Forestry Commission in England and the governance around the production and execution of Catchment Plans will need careful consideration. We are not advocating additional catchment authorities, but a combination of the functions of the three principal bodies may lead to the creation of a system of new catchment bodies overseen by a single national body in one organisation England. Wales has already combined the functions, Scotland has evolved very close working relationships and NI is reviewing its governance.

*What are the positives/negatives of current schemes (e.g. Countryside Stewardship) that should be retained/avoided?*

22. We see the 'Active Farmer rule' within the Basic Payment Scheme to be limiting the scope for environmental protection and believe that the BPS should be extended to some types of businesses which do not use land for agricultural purposes. Businesses that are excluded for being a 'permanent sport and recreation ground' can contribute to the overall protection of the natural environment and mitigation of environmental damage. Camping grounds, caravan sites, golf courses and others all use large amounts of land that, if used for agriculture, would be receiving of additional payments under the 'greening rules'. By allowing these kinds of businesses to apply for the environmental rewards under a system similar to the BPS, SMEs could claim financial rewards for encouraging environmental and ecosystem good practice on their lands. The prevention of land degradation is vital for industries beyond just agriculture because of the large ranging impacts of improper natural resource management, such as flooding. It is for this reason, the promotion of rural SMEs and for the encouragement of responsible environmental usage that we call for any replacement to the BPS to go beyond just agriculture.

*How should future UK agri-environment support be administered, and what outcomes should it focus on?*

23. The outcomes of future UK agri-environment support should feed into four pillars - environment, economy, community and knowledge. These are all linked, as good environmental practice in natural resources management should lead to greater economic results going forward and benefit local communities. We should build a comprehensive picture of the knowledge required for good natural resource management and how we can apply this elsewhere.

*What are the prospects and challenges for future environmental stewardship schemes in the devolved administrations?*

*How much divergence in policy between the nations of the United Kingdom is likely?*

*How can divergence be managed?*

These questions are answered together

24. We actively encourage divergence in policy between the nations of the United Kingdom. SocEnv are firm believers that the devolved regions are best suited to represent the needs of their citizens and act in their best interests. It is only through this more local approach to environmental issues that meaningful and effective progress can be made. We have explained already that Wales is further down the path of considering NRM than other parts of the UK. We have described how a new system might work within, and between the devolved nations including England as a separate entity the devolved. This would put the focus upon responding to the needs of local communities and creating a greater sense of community and personal engagement.
25. Divergence can be best managed through the implementation of a top level vision for the environment in the UK and through coordination across borders, with delivery based on a local level via the devolved administrations in Wales, Scotland and Northern Ireland.

*What are the future risks and opportunities to innovative land practices, such as managed rewilding?*

26. Innovation has a major part to play in the realm of natural resource management. With the UK now able to define its own regulatory framework, there can be allowance for the trialling and adaption of new land practices and initiatives. Lessons can be learned from the Department for International Development and their approaches to experimental projects and tools for monitoring, evaluation and learning. This can help the UK trial innovative land practices and initiatives whilst ensuring that risk is controlled. There is the opportunity for the UK to be a world leader in land practice.

*What role can rewilding play in conservation and restoration of habitats and wildlife?*

27. We believe that rewilding is an important asset when used as part of a comprehensive natural resource management and agri-environment toolkit. However, it is not a fix all solution and should only be used where appropriate.

*What evidence is there to support the incentivising of such schemes in any new land management policies?*

28. The Society has already made a submission to the EAC on the role of the Treasury in sustainability earlier this year. We advocate an overhaul of all environmental tax and incentive schemes to create a single scheme. There is too much fragmentation at present

29. SocEnv is currently in the progress of surveying over 7,000 professional and accredited environmental professionals and will be questioning them on whether they believe incentivisation or risk of punishment is a better driver for good environmental practice. We will ensure that our findings are made available to all decision makers involved in the drafting of any new land management policies.