

# Institute of Environmental Management and Assessment (IEMA) response to the Department for Environment, Food and Rural Affairs Consultation on Environmental Targets

## About IEMA

1. IEMA is the membership body for environment and sustainability professionals. IEMA's growing membership of over 18,500 professionals work at the interface between organisations, the environment and society in a range of critical roles (for example from sustainability directors through to climate change leads and in consultancy and advisory roles). We also work with a range of corporate partners, universities, FE colleges and training providers. IEMA members are active across all sectors of the economy, for example in construction, manufacturing, logistics, facilities management, financial services, retail, food, consultancy and the public sector.

## Executive Summary

2. IEMA has played an active role in supporting the development of the new governance framework in the Environment Act, particularly through our contribution to the Broadway Initiative's Blueprint for an Environment Act<sup>1</sup> and the working paper on the Role and Design of Objectives and Targets<sup>2</sup>. Our response to this consultation is informed through widespread engagement with IEMA members in webinars and workshops, as well as dialogue with Defra policy officials and key stakeholders.
3. Setting the first legally binding targets under the Environment Act is an opportunity to create much clearer direction for the environment. As well as providing the framework for national policies, it is also an opportunity to galvanise action and investment from businesses, towns, cities, NGOs and the public towards a common set of environmental outcomes.
4. The net zero legally binding target, because of its clarity, is beginning to create that self-generating momentum, within a framework of government policy and regulation. City regions to whole sectors and individual businesses are creating their own targets enabling them to lead and design necessary change and sequence cost-effective investment reflecting their own circumstances. In contrast, the current situation in terms of the wider environment is that businesses and localities develop their own initiatives generally unconnected with national policies because, historically, government has never been clear or robust on our shared national goals and targets.
5. While many of the individual environmental targets set out in the consultation are well conceived, overall we think they miss the wider opportunity. IEMA believes that with a small number of focussed improvements, these targets could hit the mark in a way that

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<sup>1</sup> Broadway Initiative (November 2018) Blueprint for an Environment Act [Blueprint for an Environment Act](#)

<sup>2</sup> Environment Bill: the role and design of objectives and targets (September 2019) [Objectives and Targets working paper](#)

would galvanise greater support for delivery. In summary this would mean setting the proposed targets within a clearer overall architecture, with:

- a. The inclusion of “apex” targets for water and resources & waste, alongside those for nature, air and net-zero carbon emissions. This will give outcome targets for the whole of the environment that everyone can relate to, and provide a coherent framework for setting attribution and activity based targets which contribute to the overall outcomes.
  - b. Alignment of target end dates to decadal intervals, making the targets easier to communicate and to align programmes of work (e.g. for nature and water to take joined up action). Defra’s proposed target end-dates are 2030, 2037, 2040, 2042, 2050 – we believe this makes it unnecessarily confusing for businesses and others to relate to.
  - c. A target for the status of protected sites should be included, given that Defra acknowledge this as critical to achieving the species abundance target.
  - d. A clear roadmap for the introduction of additional targets (including for soil and construction waste) and the refresh/update of existing legally binding targets.
6. The table in Annex 1 gives ideas on how that framework could be achieved, towards an overall vision statement which Defra Minister Lord Goldsmith said “...are, in effect, a summary of the Bill in its totality—it could not be a clearer summary, in a sense.<sup>3</sup>” We also believe there needs to be a strong link between these targets and the first Environmental Improvement Plan (EIP).
  7. The development of the first EIP provides a crucial opportunity to evolve the Government’s 25 Year Environment Plan from a high-level vision into a clear strategy underpinned by specific interim targets and specific sets of policy measures. This will drive business planning and subsequent investment in the near-term and aid delivery of interim and long-term targets. The EIP should link long-term targets, interim targets, and regulatory/sectoral frameworks into a coherent whole and be closely integrated with the Government’s Net Zero Strategy. Meaningful stakeholder engagement in the coming months on the development of the EIP will therefore be crucial, as will consideration of the skills and workforce requirements to deliver on the ambition.
  8. The role of the Office for Environmental Protection in supporting the development and implementation of the EIP, the long-term targets, and linking to the implementation of the Environmental Principles Policy Statement will also be essential for accountability, transparency and durability.
  9. Our response to the specific targets proposed in the consultation are set out below. We are happy for IEMA’s response to be made publicly available.

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<sup>3</sup> [Environment Bill – Lord Committee Stage](#) Lord Goldsmith responding to the Earl of Lindsay’s amendment for an overall objective to be included in the Bill.

## Target proposals for biodiversity on land

**Do you agree or disagree that the proposed combination of biodiversity targets will be a good measure of changes in the health of our 'biodiversity'?**

### **Disagree**

10. We believe that a number of focussed enhancements to the proposed biodiversity targets are needed to help drive concerted improvement actions. In summary:
  - a. the suite of biodiversity targets that are proposed have a significant omission (i.e. the lack of a target for the state of terrestrial protected sites);
  - b. there is a lack of clarity on how the baseline for evaluating the 2030 species abundance target will be evaluated;
  - c. the baseline year for determining whether the 2042 species abundance target should be set against current levels of species abundance; and
  - d. enhancement is needed to the level of ambition for the wider habitat target.

## 2030 and long-term species abundance targets

**Do you agree or disagree with the level of ambition of a 10% increase proposed for the long-term species abundance target?**

### **Disagree**

11. While we support the proposal in the Environment Act 2021 to halt the decline of species abundance by 2030, we have a significant concern with using 2030 as the baseline against which the 2042 10% increase will be set. Using a future baseline date introduces uncertainty; indeed there is the potential that, if species abundance decline between 2022 and 2030, the level of species abundance in 2042 could be below current levels.
12. We believe that:
  - a. The baseline against which both halting the decline and delivering a 10% improvement should be set at 2022 current levels of species abundance. Recognising that weather and other factors (e.g. avian flu) may cause short term fluctuations in species abundance on an annual basis, the baseline date should be quantified as the mean level of species abundance over the last 3 years for which data is available for the 1071 species in the index (see fig 13 in the Biodiversity, Terrestrial and Freshwater Evidence Report April 2022).
  - b. Targets dates should be aligned at decadal intervals and therefore the date for achieving at 10% increase in species abundance should be 2040, not 2042.

## Long-term species extinction risk target

**Do you agree or disagree with the ambition proposed for the long-term species extinction risk target to improve the England-level GB Red List Index?**

13. The long-term species extinction risk target is proposed as a composite index of 8000 species evaluated against the IUCN red list classification. Although the proposed target is that there should be an improvement by 2042 against a 2022 baseline, the magnitude of improvement isn't stated.
14. In terms of this particular target, we make the following observations:
- a. Given the number of species proposed in the index and the timescale over which measurable change can reasonably be expected, Defra has proposed that the dataset be updated every 10 years. We see this as being problematic, given the legal requirement that interim targets at 5yr intervals must be included in EIPs and that they must be capable of being objectively measured. We recommend that Defra addresses how an interim target can a) be set and b) progress towards achieving it can be measured, before setting a long-term target.
  - b. Delivering improvements in species extinction risk are noted in the evidence report as overlapping with the actions needed to improve species abundance. This raises two key questions:
    - i. If the achievement of both targets requires largely the same action, is there a need for a species extinction risk target?
    - ii. If there is a need for an extinction risk target, should it be focussed on those species at the highest risk of extinction, rather than as an index of 8000 species?
15. The proposed target date should be aligned to 2040.

### Long-term wider habitats target

**Do you agree or disagree with the level of ambition of 'in excess of 500,000 hectares' proposed for the long-term wider habitats target?**

**Disagree**

**What reasons can you provide for why the government should consider a different level of ambition?**

**Do you agree or disagree that all wildlife-rich habitat types should count towards the target?**

**Are there any habitat types that you think should not count towards the target? [[peatland], [grassland], [heathland], [scrub], [native woodland], [hedgerows], [traditional orchards], [arable field margins], [estuarine and coastal water habitats], [wetlands], [rivers / streams], [lakes / ponds], [other habitat types that you think should not count towards the target]]**

**What reasons can you provide for why these habitats should not count towards the target?**

16. We disagree with the level of ambition stated for the creation or improvement of in excess of 500,000 hectares of wildlife rich habitat. We are concerned for the following reasons:

- a. The proposed target is not a 'net' increase of 500,000ha; rather, the target "is expected to drive a net increase in creation and restoration of 'wildlife-rich' habitats across a range of habitat types". We believe that as a minimum, the target should be a net increase of 500,000ha. Also to note, 99% restoration and 1% increase can have a very different outcome in species from 99% increase and 1% restoration.
- b. The target date should be aligned to 2040, not 2042.
- c. There is potential overlap between this target and the proposed target for woodland cover. Care is needed to avoid double counting and to ensure a wide variety of habitat types are created (i.e. the right creation/restoration for the right location).
- d. We note that while wildlife rich arable field margins can have an important role to play in nature recovery, they can be relatively transient depending on the extent and duration of agricultural payment subsidies. As such, care will need to be taken if arable field margins are included, to ensure these new habitats are durable.
- e. We agree that improvements made to protected sites should be excluded from contributing towards the habitat creation target. All protected sites/areas should have appropriate management plans in place that are being implemented, to ensure that habitats are in favourable condition. While we note that only 40% of protected sites are in favourable condition<sup>4</sup>, improvement actions to recover the remaining 60% of sites should be considered separately from the long-term wider habitats target.
- f. There is a lack of clarity on the mechanisms for preserving new/restored habitats and how they will link into Local Nature Recovery Strategies and Nature Recovery Networks. This will be needed to optimise benefits for nature.

## Terrestrial Protected Sites Target

17. As noted above, we disagree with the exclusion of a terrestrial protected sites target from the initial suite of targets. The consultation paper makes clear that improving the quality of protected sites is critical to achieving the proposed species abundance and extinction risk targets. The exclusion is therefore a significant omission from the suite of targets that are proposed, particularly given that only 40% of protected sites are in favourable condition<sup>5</sup>. Defra's rationale for not setting a protected habitat target is that the Nature Recovery Green Paper proposes reforms to the framework of designated sites. We believe this is misguided, as:

- a. Whatever structural changes may be made to the framework of designated sites through the Green Paper reforms, they will still need to be classified in terms of their status (e.g. favourable, recovering favourable, declining etc).

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<sup>4</sup> [Extent and condition of protected areas.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101212/extent_and_condition_of_protected_areas.pdf)

<sup>5</sup> [Extent and condition of protected areas.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101212/extent_and_condition_of_protected_areas.pdf)

- b. A rapid improvement in the quality and status of designated features in protected sites is critical to achieving the 2030 and 2042 species abundance targets. Ecological timescales mean we do not have the luxury of waiting for the conclusion and implementation of the Green Paper reforms before setting an improvement target and taking appropriate action.
- c. The focus of reorganising the framework of protected sites should follow from an understanding of where change is needed.

### Target proposals for biodiversity in the sea

**Do you agree or disagree with the level of ambition proposed for the Marine Protected Area target?**

#### **Disagree.**

- 18. We question the ambition of the proposed target relating to the status of designated features of Marine Protected Areas. The Marine Evidence Pack<sup>6</sup> gives an estimated range of 71%-88% of designated features being in favourable condition by 2042 – Defra’s proposal for 70% lacks ambition. We believe that at least 75% of designated features should be in favourable condition by 2040.

### Target proposals to improve water quality and availability

- 19. We believe that there is an opportunity to establish a long -term apex target for water quality. The current legally binding target for the ecological status of natural waters is 2027. Recognising that only 16% of natural waterways in England are in good or high quality status<sup>7</sup>, and with a 2027 target of 75%, an updated longer-term target is needed. We propose a long-term apex target of at least 85% of natural waters to be of good or high ecological status by 2040, which would increase ambition and provide the basis for investment over the long-term.

**Do you agree or disagree with the level of ambition proposed for an abandoned metal mines target?**

- 20. We are supportive of the proposed target relating to abandoned metal mines.

### Nutrient Pollution

**In addition to the proposed national target, we would like to set out ambitions for reducing nutrient pollution from agriculture in individual catchments. Do you agree or disagree that this approach would strengthen the national target? [Agree/Disagree/Don’t know]**

**Agree**

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<sup>6</sup> [Biodiversity marine target Detailed evidence report.pdf \(defra.gov.uk\)](#)

<sup>7</sup> [State of the water environment indicator B3: supporting evidence - GOV.UK \(www.gov.uk\)](#)

**Why do you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target?**

21. Nutrient pollution is a significant contributor to the poor ecological status of natural waters<sup>8</sup>. Given that only 16% of natural waters are in good or high ecological status<sup>9</sup>, this highlights that improvements are widely needed across all catchments.

## **Nutrient pollution from wastewater**

**The target needs to allow flexibility for water companies to use best available strategies to reduce phosphorus pollution, including the use of nature-based and catchment-based solutions. Do you agree or disagree that the proposed target provides this flexibility?**

**Agree**

**Do you agree or disagree with the level of ambition proposed for the nutrient targets?**

**Agree**

## **Water Demand**

**Do you agree or disagree with the level of ambition proposed for a water demand target?**

**Disagree**

**What reasons can you provide for why government should consider a different level of ambition?**

22. We are concerned that the proposed metric (the total “Distributed Input - DI” per capita) does not provide sufficient focus to address the long-term challenge of water demand, a critical issue given that all parts of the country are projected to be water-stressed by 2050.
23. The water demand target should have at its core the aim to leave sufficient water in the natural environment to support healthy and vibrant ecosystems. Achievement of Defra’s proposed target (i.e. to reduce DI 20% per head of population by 2037/38) will in part depend on population growth. We believe that a more appropriate metric would be to reduce total Distributed Input by 15% by 2040, compared with current levels). Achievement of the target would be through a combination of measures, including:
- a. Leakage reduction in the water distribution system.
  - b. Domestic water efficiency measures.
  - c. Business and public sector water efficiency targets.

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<sup>8</sup> [Water targets Detailed Evidence report.pdf \(defra.gov.uk\)](#)

<sup>9</sup> [State of the water environment indicator B3: supporting evidence - GOV.UK \(www.gov.uk\)](#)

24. We believe this would provide more certainty on the long-term environmental outcomes that need to be achieved, provide the basis for focussed policies and measures to help drive action, and is a target that is easy to communicate publicly.

### Target proposals for woodland cover

25. We are supportive of the proposal to increase woodland cover from 14.5% to 17.5% of England by 2050, a 20% increase compared with current coverage. However, it will be important to ensure effective coordination of actions and incentives for tree planting, recognising that an approach of ‘the right trees in the right place’ can deliver multi-functional benefits and contribute to improving water quality, air quality, GHG removals and biodiversity; whereas, fast-growing single-species carbon-landscapes driven by GHG emission offset markets would be a missed opportunity.

**Do you agree or disagree with the proposed metric for a tree and woodland cover target?**

Agree

**Do you agree or disagree that short rotation coppice and short rotation forestry plantations should be initially excluded from a woodland cover target?**

Agree

**Do you agree or disagree with the proposed inclusion of trees in woodlands, as well as trees in hedgerows, orchards, in fields, and in towns and cities?**

Agree

**Do you agree or disagree with our proposed level of ambition for a tree and woodland cover target?**

Agree

### Target proposals for resource efficiency and waste reduction

26. We are concerned that the consultation proposals exclude a target for resource productivity. We see a national resource productivity target as being crucial to addressing the circularity gap and focussing businesses on addressing opportunities at the top of the waste hierarchy. Indeed, this omission when set alongside the proposed inclusion of a residual waste target gives the impression that action should be focussed at the bottom of the waste hierarchy.

**Do you agree or disagree with the proposed scope of the residual waste target being ‘all residual waste excluding major mineral wastes’?**

27. We are concerned that there is no proposal for the inclusion of Construction, Demolition and Excavation wastes (CDE) in the initial suite of targets. We understand why excluding mineral wastes, including CDE, from the scope of the residual waste target is necessary; however, we strongly encourage separate tracking of major mineral wastes and setting a target, given that the construction industry is one of the three economic sectors (along with



agriculture and fisheries, food and beverages) as being most dependent on natural resources for its raw materials<sup>10</sup>. This is important given the significant potential to reduce waste, enhance resource productivity and contribute to reducing greenhouse gas emissions<sup>11</sup>.

28. We also believe that the potential to develop a carbon intensity-based target for residual waste should be explored. For example, London has been measuring carbon emissions from waste management since 2011. Taking a whole systems approach, London has been able to guide how residual waste should be managed to achieve the best environmental and economic outcomes. The higher the carbon emissions, the more high carbon and valuable materials are entering the residual waste stream and being incinerated or landfilled. This approach not only allows policy makers to address residual waste at a carbon level, (e.g. to focus on light but high in non-biogenic carbon materials like plastics) but can use these measurements towards carbon reduction targets<sup>12</sup> expanding towards scope 3 emissions and impacts. Based on the experience in London, we believe additional carbon tracking measurement for residual waste should be targeted.

**Do you agree or disagree that our proposed method of measuring the target metric is appropriate?**

29. We recommend that the metric includes all waste sent overseas, including that which is not for energy recovery.

**Do you agree or disagree that local authorities should have a legal requirement to report this waste data, similar to the previous legal requirement they had until 2020?**

30. Yes, we agree that Local Authorities (LAs) are best placed to continue to report waste data. However, there needs to be additional inputs from waste facilities and private companies to publicly report the amount of commercial and industrial waste collected and sent for disposal to build a better and robust data system. That will give a full picture of waste and allow LAs and private companies to run services that focus on the best environmental outcomes and capture more materials for recycling and implement waste reduction interventions. LAs are best placed to report the waste they collect and send to disposal, however we do not agree they are best placed to collect private sector waste without further legislation and appropriate resourcing. This responsibility would fit better with the environment agency with WasteDataFlow expanded to allow for privately collected waste tonnages being reported.

**Do you agree or disagree with the level of ambition proposed for a waste reduction target?**

31. An ambitious target is welcomed and this should be set to reflect the new waste landscape that should be in place when currently planned initiatives are implemented (extended producer responsibility schemes and national household recycling consistency). However,

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<sup>10</sup> [WEF New Nature Economy Report 2020.pdf \(weforum.org\)](#)

<sup>11</sup> [Completing the Picture - How the circular economy tackles climate change | Shared by Climate Change \(thirdlight.com\)](#)

<sup>12</sup> [https://www.london.gov.uk/sites/default/files/gla\\_eps\\_update\\_2017\\_final.pdf](https://www.london.gov.uk/sites/default/files/gla_eps_update_2017_final.pdf)

we recognise the uncertainty around whether these new schemes and over time target may need to be redefined against an updated baseline.

32. A key issue will be how to translate the national target into action for Waste Collection Authorities to be able to develop the correct strategies for their population, local conditions and housing stock. We would question whether using per capita as a measurement will be an even distribution at a local level. For example, flatted dwellings have lower recycling rates and cities can have up to 80% of their population living in flats, compared to more suburban or rural areas where the occupancy and dwelling type can be larger. A regional approach is needed to help authorities who have the legal responsibilities for 'waste per capita'. Under the current legislation framework, due to local conditions/characteristics and quantity of dwelling types, some areas of the country cannot achieve a high household recycling rate. Research conducted by WRAP for ReLondon found that using the best recycling options which achieve the highest recycling rate, the highest household recycling rate possible across London would be 42%<sup>13</sup>. This needs to be recognised when setting a waste per capita metric.
33. As mentioned in the consultation document, while we wait to hear the detail and see the effect of the extended producer responsibility schemes, deposit return scheme and the recycling consistency framework will have on household and commercial waste levels, it is hard to predict if this proposed metric and waste per capita is suitable and ambitious. It will take a number of years to see the effect of these new systems in place and therefore recommend as part of the Environment Improvement Plan, a review is carried out by the government every two years not five years. This will also allow for assessment on whether waste will go down in particular sectors, streams and settings. Attention should also be paid to population increases, potentially accelerating meeting the proposed metric. If this were to happen, the review should reset the target and be more ambitious.

## Resource productivity

### **Do you agree or disagree with our proposed metric for considering resource productivity?**

34. For the waste reduction proposed target, the government seems to have used an effective steering group and applied rapid assessments to different elements that have been proposed. However, this does not seem to be the case for the resource productivity target. These two important targets should work in tandem, with the resource productivity underpinning the waste reduction target to allow for circularity and reduce virgin material use. They must be fit for purpose from the beginning. We suggest the government should focus efforts to explore progressive metrics for the resource productivity target and committing to consulting and implementing these within two years of publication of the first Environmental Improvement Plan.

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<sup>13</sup> [https://www.london.gov.uk/sites/default/files/les\\_appendix\\_2\\_-\\_evidence\\_base\\_0\\_0.pdf](https://www.london.gov.uk/sites/default/files/les_appendix_2_-_evidence_base_0_0.pdf)

35. We recommend approaching the target from the principles we set out below to accelerate to a circular economy. Addressing and focusing on the circularity gap<sup>14</sup> will enable the best starting point to then focus on the environmental metrics and sector/material specific targets that are needed, while presenting the opportunity to also include the synergies with other key sustainability themes in the metrics (for example, net zero and biodiversity net gain). Appropriate interventions can then be developed in a much easier way, in effect, working backwards towards the change needed and in keeping with circular economy principles. There have been progressive policies, albeit, slowly implemented and lacking in ambition, with regards to banning problem materials and taxing content of materials that do not have a percentage of recycled materials. These levers can be replicated across many production/manufacturing sectors of virgin materials.
36. They should for starters, at least include:
- a. Volume of Raw Materials Consumed (absolute RMC to measure materials in)
  - b. Material footprint (ONS data)
  - c. Volume of Residual Waste (absolute RW to measure materials out. NB this is partially accounted for in the proposed target, albeit per capita)
  - d. Percentage of RMC that becomes RW (calculation is  $RW/RMC*100$ , as this will be useful in the early stages of moving to a circular economy)

**Of the possible policy interventions described, which do you think will be most effective to meet a resource productivity target? Please specify whether these policies would be most effective if implemented nationally or regionally, and whether measures should be product or sector-specific.**

37. National implementation is preferred for fairness and at material level so sectors and products are given equal priority. The policy interventions listed sound a positive way forward and we would hope they are implemented in the right way for maximum positive environmental outcomes. However, until the extended producer responsibility schemes are revealed and the second Waste Prevention Programme is published later this year, it is difficult to answer this question. The focus must be to move up the waste hierarchy and the government must build in circularity into all policy development.
38. The government needs to close the loop in policy design so resource productivity and residual waste targets clearly support each other. National policy intervention is needed in eco-design, for durability, disassembly and refurbishment (e.g. the right to repair<sup>15</sup>). A circularity threshold should be implemented in product design and procurement and reuse optimised as currently it is estimated that 80% of household items are used less than once a month<sup>16</sup>.
39. The government needs to review current waste legislation because this is a blocker to circular economy practice. Navigating current waste legislation is difficult for many and doesn't encourage circular practice. For example, a business reusing office interiors and

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<sup>14</sup> <https://www.circularity-gap.world/2022#Download-the-report>

<sup>15</sup> <https://www.recyclingtoday.com/article/new-york-approves-digital-right-to-repair/>

<sup>16</sup> [#RTF22 | Policy changes needed to help reduce consumption, says WRAP \(circularonline.co.uk\)](#)

transporting these items to another site might be open to legal action due to waste carrier license requirements and definitions of waste.

40. A recent YouGov poll showed that 87% of UK adults are unaware of what the circular economy is<sup>17</sup>. Policy focusing on awareness raising is needed and support should be given to LAs to promote circular practices so they are suitable for the area the public live in.

## Target proposals for air quality

**Do you agree or disagree with the level of ambition proposed for a PM2.5 concentration target?**

**Disagree**

**What reasons can you provide for why the government should consider a different level of ambition?**

41. Short-term and long-term exposure to PM2.5 are linked with a range of negative health outcomes, including shortening the lives of susceptible individuals through stroke, cancers, respiratory and other diseases. It is recognised that there is no safe threshold limit below which there is no risk of harm to health; therefore, the pace at which PM2.5 emissions are reduced is critical.

42. For IEMA, the key issue is whether the target to achieve an Annual Mean Concentration of 10µg m<sup>-3</sup> to be met across England by 2040 should be met sooner, and the relative costs/benefits of doing so. The Air Quality Impact Assessment<sup>18</sup> gives the Total Net Present Social Value of £108bn; however, there is no CBA provided to evaluate the potential to achieve the target level more quickly (e.g. by 2030). We consider this to be a significant omission and warrants full analysis, given the potential health benefits that would be achieved by increasing the ambition.

**Do you agree or disagree with the level of ambition proposed for a population exposure reduction target?**

**Don't know.**

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<sup>17</sup> [Survey | Almost 9 in 10 UK adults don't know what the circular economy is \(circularonline.co.uk\)](https://www.circularonline.co.uk/survey/Almost-9-in-10-UK-adults-dont-know-what-the-circular-economy-is/)

<sup>18</sup> [Air quality targets Impact Assessment.pdf \(defra.gov.uk\)](https://www.defra.gov.uk/air-quality-targets-impact-assessment.pdf)

## Annex 1

<b>Overarching Vision</b>				
Within the framework of sustainable development, achieve and maintain: <ol style="list-style-type: none"> <li>a) A healthy, resilient and biodiverse natural environment</li> <li>b) An environment that supports human health and wellbeing for all</li> <li>c) Sustainable use of natural and physical resources</li> </ol>				
	<b>Biodiversity</b>	<b>Water</b>	<b>Air Quality</b>	<b>Resource Efficiency and Waste</b>
<b>Narrative Outcome</b>	Thriving wildlife and nature.	Clean water to meet the needs of people, the environment and the economy.	Clean air for people's health and wellbeing	Maximising value and resilience of material resources used in the economy
<b>Apex Targets – all with 2040 target dates</b>	Increase species abundance by at least 10% by 2040 compared to 2022 levels.	85% of natural water courses are at good ecological status by 2040  Reduce public water supply by 15% by 2040 against a 2019/20 baseline	Reduce population exposure to PM2.5 by 35% by 2040 (compared to a base year of 2018)	
<b>Legally binding contributory targets</b>	Halt the decline of species abundance by 2030  Improve the England-level GB Red List Index for species extinction risk by 2040, compared to 2022 levels.  Achieve a net increase of at least 500,000 hectares of a range of wildlife-rich habitats	Reduce the length of rivers and estuaries polluted by target substances (cadmium, nickel, lead, copper, zinc, arsenic) from abandoned mines by 50% by 2037.  Reduce nitrogen, phosphorus and sediment contribution from agriculture in the water environment by	Annual Mean Concentration Target ('concentration target') of PM2.5– a target of 10 micrograms per cubic metre ( $\mu\text{g m}^{-3}$ ) to be met across England by 2030	Reduce residual waste (excluding major mineral wastes) kg per capita by 50% by 2040 from 2019 levels.

	<p>outside protected sites by 2040, compared to 2022 levels.</p> <p>Increase tree canopy and woodland cover from 14.5% to 17.5% of total land area in England by 2050</p> <p>75% of the designated features in the MPA network to be in favourable condition by 2040, with the remainder in recovering condition, and additional reporting on changes in individual feature condition</p>	<p>at least 40% by 2037 against a 2018 baseline.</p> <p>Reduce phosphorus loadings from treated wastewater by 80% by 2037 (against a 2020 baseline).</p>		
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