

ABOUT HUMANIST CLIMATE ACTION

Humanist Climate Action is a network of Humanists UK members and supporters committed to redefining lifestyles and campaigning for policies that promote low-carbon, ethical, and sustainable living in the light of the degeneration of the Earth's climate and biodiversity. At Humanists UK, we want a tolerant world where rational thinking and kindness prevail. We work to support lasting change for a better society, championing ideas for the one life we have. We started out in 1896, and since then we have been a growing movement at the forefront of social change. Today we're trusted by over 100,000 members and supporters and over 70 local and special interest affiliates to promote humanism. There are over 115 members of the All-Party Parliamentary Humanist Group.

RESPONSE TO CONSULTATION QUESTIONS

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

What additional indicators do you think may be necessary?

We disagree with the exclusion of targets for SSSIs and other protected sites. We recognise the need for an appropriate metric and the detailed work which this will require, but we submit that there is no reason not to set broad targets immediately for more effective protection of SSSIs and prevention of the loss of such habitats and their biodiversity.¹

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

Disagree

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

Given the scale of the problem, we submit that the target of a 10% increase is too low and support calls for a target of 20%. We also disagree with the setting of the baseline at 2030 levels. If the aim is, as stated, to 'halt the decline in species abundance by 2030' this implies that species abundance in 2030 could be even lower than it is at present. We support a baseline of 2022 for the targeted increase.

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?

Agree

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?

¹ Thomas Starne et al, 'The extent and effectiveness of protected areas in the UK' *Global Ecology and Conservation*, Volume 30, October 2021. <https://doi.org/10.1016/j.gecco.2021.e01745>



Disagree

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

We support the case for a more ambitious target of 750,000 hectares.

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

Agree.

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.

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

The network of MPAs should be expanded to cover more than 40% of English waters – if 60% of waters are not covered by management measures to stop damaging activities and recoverability targets the overall effect will still be detrimental to ocean biodiversity. The target year of 2024 for preventing all damaging activity should – at the very latest – prevent most if not all damaging activities ceasing within the next year. While it is understood that habitats can take a very long time to recover, as much as possible should be done to encourage the process in the 20 years to 2042. This includes preventing damage from happening in the first place as recovery time is often many times longer than damage time.

Target proposals to improve water quality and availability

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

Disagree

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

HCA believes a more ambitious target should be set for the overall condition of rivers, streams and smaller water bodies, aiming for high standards for both ecology and human health. Under the proposed framework, there is no target for the quality of rivers and streams. Instead, the Government is proposing targets to reduce pollution only from specific sectors: agriculture and water. The absence of an overall target to improve water and river quality is an opportunity lost. Targets to reduce pollution from these specific sectors could be met, but overall water and river quality could remain low, or even worsen under these limited proposals. The EU's Water Framework Directive set a target for overall ecological condition of rivers (expiring in 2027), so there will be no long-term target ambition in law for improving water or river quality.

Compliance with the proposed targets for water companies and for farmers will be assessed on the basis of modelling data and actions taken, rather than real world assessments of pollution in rivers. This leaves considerable scope for error and for the overall condition of rivers and streams to-be obscured. All targets have to be measured and policed, but cuts to the Environment Agency budget of nearly two-thirds since 2010 mean it would take staff 200 years to visit every farm in Britain. More investment in compliance is needed to ensure that ambitious targets can be set, enforced, and achieved.



Overall, the targets proposed for water might give the impression of progress, while allowing the real condition of our rivers and streams to not improve or decline. The targets miss out major sources of pollution from water and sewage companies, they depend on unreliable methods of measurement, and they set no ambition at all for the overall quality of our rivers. That is completely out of step with demand for healthier rivers.

Target proposals for woodland cover

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

Don't know.

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. We welcome the inclusion of urban trees in the target as arboreal cover will be a necessary and key adaptation to climate change and a vital habitat for urban biodiversity. Similarly, hedgerows and fields play key roles in maintaining biodiversity in and around our countryside, including in areas of food production. It is important to note that creating siloed stands of trees in otherwise low-biodiversity areas may have a limited impact in terms of enhancing biodiversity. Interconnections between sites will be important as corridors for wildlife recovery and expansion.

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

Disagree

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

We agree with the level of ambition covered in these proposals. However the target states nothing about the quality or placement of woodland being created. A substantial level of the new woodland cover should expand and connect existing woodlands so that the existing wildlife can thrive and expand in line with wider biodiversity targets. The woodland should also be of a high quality, such as planting native trees in appropriate habitats for their type. More detail on agroforestry targets will be welcome, in order to ensure areas dedicated to agroforestry and food production do not become biodiversity-deserts.

Target proposals for resource efficiency and waste reduction

To ensure a transition to a more circular economy, these long-term targets should be supported by further measures and interim targets to support reuse and repairability. There should be a long-term target to reduce the UK's global footprint, ensuring supply chains do not cause habitat destruction and over-extraction in other countries. These targets should ensure that goods imported and business conducted overseas are consistent with the standards set in the UK, and do not drive harm to ecosystems or species.

It is critical that these targets lay the groundwork to use materials in a more productive way and the longer term goal must be to significantly reduce the UK's global materials footprint, and work in



coordination with UK governments. However, the targets require significant strengthening to achieve that aim.

Sector specific targets must be set for both resource productivity and residual waste reduction. An economy-wide target does not offer sufficient incentive for different sectors, as this risks targets being achieved by minor changes in certain sectors whilst more challenging areas are left unchanged, undermining the purpose of the targets entirely. To deliver on their ambitions, we propose DEFRA adopt a more ambitious approach, matching and surpassing the lead set by policy in other countries such as France's waste prevention plan.

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

Disagree

What reasons or potential unintended consequences can you provide or foresee for why the government should consider a different method?

Material footprint metrics should provide an in depth measurement to understand, reduce and improve our resource use across land, water and carbon, by including additional indicators for footprints aside from a simple weight-based measure. This target would create a more holistic approach to waste and resources policy across the spectrum and avoid policies being siloed.

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?

Don't know

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

Disagree

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

For waste production the target should cover minimisation of waste in each category: household, municipal, commercial and industrial and construction, demolition, and excavation.

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

Disagree

What reasons, or potential unintended consequences can you provide for why the government should consider a different metric and what data exists to enable reporting for this alternate metric?

For resource productivity, the most important sectors should include construction, vehicle manufacturing, electronics, food, and textiles. Resource productivity should be measured by raw material consumption. We strongly support this proposed measurement for resource productivity because it offers a far stronger measurement than domestic material consumption, which only considers material sourced within our borders. It is important to consider both domestic and overseas extraction to avoid offshoring resultant impacts.

Resource productivity must be ambitious, and the Government should ensure that the target set through the Environment Act is at least as ambitious as the commitments it has previously made in



its industrial strategy and resources and waste strategy to at least double resource productivity by 2050. The Government must ensure that total footprint is falling at the same time as productivity is rising.

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?

The Government should be setting a target of 10 mg/m³ by 2030 (not 2040). This is the WHO interim target and research shows that the WHO-10 interim target is achievable almost everywhere in the UK by 2030.² This should be an interim target with an ultimate goal of 5 µg/m³ annual mean and 15 µg/m³ 24-hour mean, in accordance with the WHO guidelines of September 2021.

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

Disagree

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

The exposure target is less ambitious than the proposed reductions in the government's own Air Quality Strategy of 2019. In order to achieve the 10 µg/m³ by 2030 target, the original 50% (not 35%) target should be adhered to. We would add that setting annual means is inadequate. The Government should adopt target levels for short-term exposure, and a 15 µg/m³ 24-hour mean by 2025 should also be included in the proposals.

For more details, information, and evidence, contact Humanist Climate Action:

Lori Marriott

Humanist Climate Action Coordinator

lori.marriott@humanism.org.uk

humanists.uk

² Dajnak, D., Kitwiroon, N., Assareh, N., Stewart, G., Evangelopoulos, D., Wood, D., Walton, H. and Beevers, S., 'Pathway to WHO: achieving clean air in the UK', *Environmental Research Group*, Imperial College London. <https://www.imperial.ac.uk/media/imperial-college/medicine/sph/environmental-research-group/CAF-Technical-Report-Final.pdf>

