



Department
for Environment
Food & Rural Affairs

Environmental targets consultation summary of responses and government response: technical annexes

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We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



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Annex A: Extended summary of responses

The extended summary of responses annex only includes responses to the questions relating to the initially proposed suite of targets numbered from question 6 onwards. Questions 1 to 5 in the consultation related to the name, email address, organisation and desire for confidentiality of the respondent and so are not covered in this section.

Approach

In the analysis of responses, percentages are rounded to the nearest whole percentage. In some cases, the sum of the percentages will not add up to 100% due to rounding differences. For example, the sum could add up to 99% or 101%. Where rounding would make the percentages misleading (for example, there are responses, but they round to 0%), decimal points have been used for clarity. The percentage calculations demonstrate the percentage within a specific category, for example percentage of campaign responses or percentage of non-campaign responses.

The organisations who responded to the consultation are listed in Annex C. Some organisations were umbrella groups whose responses represented the collective views of their member organisations. These responses counted as a single view in the analysis. However, their members also responded separately in some cases and these were included in addition.

To better understand the general themes emerging, we grouped responding organisations, by best-fit based on existing knowledge or how the organisation self-describes on its website, into 5 broad sectors. These were: academic; business; non-governmental body (NGO); professional body (including unions, trade associations, multi-stakeholder alliances, professional and chartered institutes), and public sector (including councils, waste authorities and local nature partnerships). As organisations were self-identified by respondents, it should be noted that these may be responses from individuals who are members of specific organisations and therefore does not necessarily reflect that organisation's views.

Biodiversity on land

Proposed targets included in the consultation:

The Environment Act provides for a nearer-term target to halt the decline in species abundance by 2030, a world-leading commitment. We also proposed targets to:

increase species abundance by at least 10% by 2042, compared to 2030 levels.

improve the England-level Great Britain Red List Index for species extinction risk by 2042, compared to 2022 levels.

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.

Suite of Biodiversity Targets

Table 1: Number of campaign and non-campaign answers to Biodiversity on land questions 6 to 10

Question	6	7	8	9	10
Campaign	4,406 (83 %)	4,630 (90 %)	10,624 (92%)	10,570 (94%)	6,289 (88 %)
Non-campaign	903 (17 %)	540 (10 %)	923 (8%)	685 (6%)	863 (12 %)
All responses	5,309	5,170	11,547	11,255	7,152

Table 2: Number of campaign and non-campaign answers to Biodiversity on land questions 11 to 16

Question	11	12	13	14	15	16
Campaign	10,519 (96%)	10,609 (92%)	10,567 (95%)	1 (0.01%)	1 (0.8%)	1 (0.5%)
Non-campaign	478 (4%)	867 (8%)	570 (5%)	836 (99.9%)	122 (99.2%)	189 (99.5%)
All responses	10,997	11,476	11,137	837	123	190

Question 6. 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’?

There were 5,309 answers to this question, which are shown in Table 2. Responses were received from the Friends of the Earth (83), Greenpeace (1), RSPB (4,314) and the Woodland Trust (8) campaigns.

Table 3: Number of Campaign and Non-campaign answers to question 6

Response	Agree	Disagree	Don't know	Total
Campaign	1 (0%)	4,405 (100%)	0 (0%)	4,406
Non-campaign	303 (34%)	480 (53%)	120 (13%)	903
All responses	304 (6%)	4,885 (92%)	120 (2%)	5,309

Overall, most respondents (92%) disagreed that these targets would be a good measure of biodiversity changes. Almost 100% of the campaign answers disagreed with the question, whereas 53% of non-campaign answers disagreed, and 34% agreed. Proportionately, more businesses and public sector organisations agreed than disagreed with the target. However, more academics, NGOs and professional bodies disagreed than agreed.

Question 7. (If disagree with question 6) What additional indicators do you think may be necessary?

There were 5,170 answers to question 7, which invited respondents who disagreed that the proposed combination of biodiversity targets will be a good measure (from question 6)

to propose additional indicators. Friends of the Earth (290), RSPB (4,332) and the Woodland Trust campaigns (8) responded to this question.

Protected Sites

88% of answers identified protected sites as the indicator they wanted to add. Most of these answers (4,321 or 95% of all answers under this category) were from the RSPB campaign, which referred to the need to have a target to improve the condition of England’s network of Sites of Special Scientific Interest (SSSI).

Indicator for specific species

There were 113 (2% of 5,170) answers proposing additional indicator species. Within these, there were a broad range, with insects, birds, marine life, bees, and pollinators forming the bulk of those specified.

Outcome-based indicators for the habitats target

Nearly 84% of answers disagreeing that the proposed biodiversity targets would be a good measure of the health of biodiversity did so because they wanted an outcome-based indicator to be used in the long-term wider habitats target. 99% of these answers were associated with the RSPB campaign and called for “a net increase of 750,000 hectares of permanent, high quality, and diverse habitats.”

2030 and long-term species abundance target

Question 8. Do you agree or disagree with the level of ambition of a 10% increase proposed for the long-term species abundance target?

There were 11,547 answers to this question and 60,951 signatures on the Wildlife Trust petition relating to this question, which are shown in Table 3. Friends of the Earth (2,431), Greenpeace (47), RSPB (4,330) and the Woodland Trust campaigns (3,816) responded to this question.

Table 4: Number of campaign and non-campaign answers to question 8

Response	Agree	Disagree	Don't know	Total
Campaign responses	81 (1%)	10,543 (99%)	0 (0%)	10,624
Non-campaign responses	227 (25%)	607 (66%)	89 (10%)	923
Petitions	0 (0%)	60,951 (100%)	0 (0%)	60,951
All responses	308 (0.4%)	72,101 (99.5%)	89 (0.1%)	72,498

Of the 72,498 answers to this question, almost 100% disagreed with the level of ambition of the long-term species abundance target and a fraction agreed. 66% of non-campaign responses disagreed, and 25% agreed. Proportionately, businesses more often agreed with the ambition, whereas generally academics and a greater number of NGOs and professional bodies disagreed. More than half public sector organisations disagreed.

Question 9. (If disagree with Question 8) What reasons can you provide for why the government should consider a different level of ambition?

There were 11,255 answers to question 9 and 10,000 narrative answers to the Wildlife Trust petition, which invited respondents who disagreed with question 8 to provide reasons why the government should consider a different level of ambition. Friends of the Earth (2,367), Greenpeace (47), the Woodland Trust (3,815) and RSPB (4,341) campaigns responded to this question. A selection of the quotes that were included in the Wildlife Trust consultation response are included in the analysis for question 9.

Target ambition and baseline

Most answers (11,192 or 99%) identified lack of ambition as their main reason for the government considering a different target. Within that category the most popular theme was a general increase in ambition followed by setting a higher target (43% of 11,192), an earlier baseline is needed (41% of 11,192) and achieving the target earlier (7% of 11,192) were the most popular themes.

Southern Water said that “the ambition to halt species decline by 2030 is admirable and we fully support it.” However, they took issue with the baseline, noting “We wish to highlight concern about setting targets for the future based on a 2030 baseline. Much of the work needed to reverse decline can and must start now.” Devon County Council raised a similar point regarding the target year. They “agree with a target to measure widespread species abundance. However, it isn’t clear as to why this target is compared to 2030 levels rather than levels now. Why set a target from a date in the future?”

Other themes

- monitoring, enforceability and accountability concerns were cited by respondents
- the need to tie-in with other targets and to prioritise other sectors was also important to respondents
- wider pressures such as climate change, pesticide use, and pollution were identified as the main barriers to achieving the target

Long-term species extinction risk target

Question 10. Do you agree or disagree with the ambition proposed for the long-term species extinction risk target to improve the England-level Great Britain Red List Index?

There were 7,152 answers to this question, which are shown in Table 4. Friends of the Earth (2,431), Greenpeace (47), RSPB (1) and the Woodland Trust (3,810) campaigns responded to this question.

Table 5: Number of campaign and non-campaign answers to question 10

Response	Agree	Disagree	Don't know	Total
Campaign responses	81 (1%)	6,208 (99%)	0 (0%)	6,289
Non-campaign responses	343 (40%)	391 (45%)	129 (15%)	863
All responses	424 (6%)	6,599 (92%)	129 (2%)	7,152

Of the 7,152 answers to this question, 92% disagreed with the level of ambition of the target and 6% agreed. Most of the campaign responses disagreed with the ambition of the target, whereas 40% of non-campaign responses agreed and 45% disagreed. Proportionately more businesses and public sector organisations agreed with the ambition. Whereas a greater number of academics, NGOs and professional bodies did not agree.

Question 11. (If disagree with Question 10) What reasons can you provide for why the government should consider a different level of ambition?

There were 10,997 answers to question 11, which invited respondents who disagreed with the ambition proposed for the long-term species extinction risk target to improve the England-level Great Britain Red List Index (from question 10) to provide reasons for the government to consider a different level of ambition. Friends of the Earth (2,365), Greenpeace (47), RSPB (4,297) and the Woodland Trust (3,810) campaigns responded to this question.

Target ambition, definition and scope

Over half of answers (6,535 or 59%) identified lack of ambition as their main reason for a different target to be considered. Within that category, the most popular theme was a general increase in ambition followed by achieving the target earlier (8% of 6,535) and issues with the indicator (1% of 6,535). The Friends of the Earth supported this proposed target and highlighted that there is “huge public concern about the threat to species globally” and referenced a petition with over 200,000 signatures entitled “ask the government to prevent mass extinction.”

Respondents also identified concerns with the target definition and scope (4,570 or 42%). Predominantly, the reason stated for this opinion was linked to the clarity and specificity of the target (almost 100% of 4,570).

Other themes

- monitoring concerns were raised by a minority of answers (36%)
- a minority of answers (35%) raised the need to tie this target in with other targets
- wider pressures such as climate change, pesticide use, and pollution were identified as the main barriers to achieving the target

Long-term wider habitats target

Question 12. 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?

There were 11,476 answers to question 12, which are shown in Table 5. Friends of the Earth (2,431), Greenpeace (47), RPSB (4,321) and the Woodland Trust (3,810) campaigns responded to this question.

Table 6: Number of campaign and non-campaign answers to question 12

Response	Agree	Disagree	Don't know	Total
Campaign responses	81 (1%)	10,528 (99%)	0 (0%)	10,609
Non-campaign responses	295 (34%)	461 (53%)	111 (13%)	867
All responses	376 (3%)	10,989 (96%)	111 (1%)	11,476

Of the 11,476 answers to this question, 96% disagreed with the level of ambition of the target and 3% agreed with the level of ambition of the target to create or restore 500,000 hectares by 2042, relative to 2022 levels. Most of the campaigns and a small majority of the non-campaign responses disagreed with the ambition.

92% of the answers were from campaigns and almost all of them disagreed with the target. Although, 53% of non-campaign consultees also disagreed, 34% agreed with the level of ambition of the target. More businesses agreed with the level of ambition of the target than disagreed. Whereas proportionately more academics and NGOs, and more than half of public sector and professional bodies did not agree.

Question 13. (If disagree with question 12) What reasons can you provide for why the government should consider a different level of ambition?

There were 11,137 answers to question 13, which invited respondents who disagreed with level of ambition proposed for the long-term wider habitats target (from question 12) to provide reasons why the government should consider a different level of ambition. Friends of the Earth (2,367), Greenpeace (47), RSPB (4,343) and the Woodland Trust (3,810) campaigns responded to this question.

Target ambition

Most (99%) answers to this question stated a preference for an increase of ambition. A minority (42%) specifically suggested a higher target. The Wildlife Trust, RSPB and others proposed a target of 750,000 hectares and an interim target in 2030, whilst some respondents suggested a target in excess 1 million hectares. The RSPB campaign sought “a net increase of 750,000 hectares of permanent, high quality, and diverse habitats.”

Other themes

- a minority of answers (37%) raised delivery and regulation concerns, mainly linked to the monitoring of the targets
- a minority of answers (34%) raised the need to tie in this target with other targets

Question 14. Do you agree or disagree that all wildlife-rich habitat types should count towards the target?

There were 837 answers to this question, which are shown in Table 6. A single answer was received from the Greenpeace campaign.

Table 7: Number of campaign and non-campaign answers to question 14

Response	Agree	Disagree	Don't know	Total
Campaign responses	0 (0%)	1 (100%)	0 (0%)	1
Non-campaign responses	599 (72%)	111 (13%)	126 (15%)	836
All responses	599 (72%)	112 (13%)	126 (15%)	837

Of the 837 answers to this question, 72% agreed that all wildlife-rich habitat types should count towards the target and 13% disagree. Proportionately, academic, professional bodies, public sector and business responses were more likely to agree with the target. A greater number of NGOs also agreed.

The Port of London Authority said that different wildlife-rich habitats should be prioritised according to their value. They said, “It would be beneficial to have some level of weighting to the different habitats, as some provide a greater benefit and are more appropriate in some areas than in others.”

Question 15. (If disagree or don’t know to Question 14) Are there any habitat types that you think should not count towards the target?

There were 123 respondents who answered question 15, and the 3 most prevalent answers were that arable field margins, hedgerows and traditional orchards should not be included in the long-term wider habitats target. Reasons provided for these answers included that the respondents believed that the target should not include habitats that are already wildlife rich and that habitats of perceived low diversity value should not count.

‘Other’ answers indicating habitats that should not contribute towards the target, included:

- Other habitat type (35)
- Previously existing habitats (12)
- Non-native woodland (6)
- Artificial habitats (6)
- Grouse Moors (1)

‘Other habitat types’ included heathland, native woodland, hedgerows, rivers, streams, estuarine and coastal waters along with habitats considered too small such as parks and gardens.

Question 16. (If disagree or don’t know to question 14) What reasons can you provide for why these habitats should not count towards the target?

There were 190 answers for question 16. The majority of answers to this question were ‘Other’ (76%) (see below for more detail) followed by habitats of low diversity value should not count (14%). One answer identified with the Greenpeace campaign responded to this question.

Following on from question 15, the primary reason for suggesting that arable field margins, hedgerows and traditional orchards should not be included was that they were felt to be habitats with a low biodiversity value and therefore should not count.

The National Trust were concerned to see arable field margins in the target, noting that “field margins are often temporary habitats that are ploughed over, so could easily skew the target if the increases were not permanent.” They suggested the target focus on a net increase in field margins for this reason.

However, the NFU welcomed the inclusion of arable field margins and hedgerows, as “the target needs to recognise the contribution of the wider farmed landscape in supporting wildlife.”

Answers identified the following additional reasons why habitats should not count towards the target:

- ‘Other’ answers included the following reasons:
 - the target should not include habitats that are already wildlife rich - for heathland, native woodland and hedgerows
 - where habitats would require a separate target - for rivers, streams, estuarine and coastal waters, or are too small like arable field margins
 - where the habitats need preserving for carbon sequestration – for peatlands
- habitats that are considered to have a low biodiversity value (26) – for arable field margins, grassland, health land and hedgerows
- non-native woodland (13) – for arable field margins and traditional orchards
- temporary habitats (13) – for arable field margins and grassland

Biodiversity in the sea

Proposed target included 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.

Table 8: Number of campaign and non-campaign answers to Biodiversity in the sea questions

Question	17	18
Campaign responses	6,276 (88%)	6140 (94%)
Non-campaign responses	826 (12%)	388 (6%)
All responses	7,102	6,528

Question 17. Do you agree or disagree with the level of ambition proposed for the Marine Protected Area target?

There were 7,102 answers to this question, which are shown in Table 8, which included campaign responses identified with the Friends of the Earth (2,419), Greenpeace (47), and the Woodland Trust (3,810).

Table 9: Number of campaign and non-campaign answers to question 17

Response	Agree	Disagree	Don't know	Total
Campaign responses	152 (2%)	6,124 (98%)	0 (0%)	6,276
Non-campaign responses	325 (39%)	309 (37%)	192 (23%)	826
All responses	477 (7%)	6,433 (91%)	192 (3%)	7,102

Of the 7,102 answers to this question, 91% disagreed with the level of ambition of the Marine Protected Area (MPA) target and 7% agreed. A minority (325 or 39%) of the total non-campaign respondents (826), agreed with the ambition level. Most (98%) campaign responses disagreed. A greater number of businesses and public sector organisations agreed than disagreed with the ambition of the target. More than half of academics and NGOs and a greater number of professional bodies did not agree.

Question 18. (If disagree) What reasons can you provide for why the government should consider a different level of ambition?

There were 6,528 respondents who gave a reason why the government should consider a different level of ambition. Friends of the Earth (2,283), Greenpeace (47) and the Woodland Trust (3,810) campaigns responded to this question.

Most answers (99%) stated a concern about the ambition of the target, the most popular theme was a general increase in ambition, (5% of 6,455 answers) suggested the target should be achieved earlier and (3% of 6455) suggested that it should be higher. Higher proportions of the non-campaign answers proposed a shorter timeline and a higher percentage target. Some respondents proposed reductions in the target timeline ranging between 2025 and 2035 from the proposed target of 2042. Respondents suggested increasing the percentage of designated features to be in favourable condition from 70% to a range of levels from 75% to 100%. A small majority of consultees (60%) responding to this question highlighted monitoring concerns.

The Wildlife Trusts agreed that the proposed targets “provide the high level of ambition needed to improve and restore the MPA network to favourable condition.” However, they raised “an urgent need to prioritise the activities which take place in the sea to achieve recovery of MPAs.”

Improve water quality and availability

Proposed targets included 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.

Reduce nitrogen, phosphorus and sediment contribution from agriculture in the water environment by at least 40% by 2037 against a 2018 baseline.

Reduce phosphorus loadings from treated wastewater by 80% by 2037 (against a 2020 baseline).

Reduce the use of public water supply in England per head of population by 20% by 2037.

Table 10: Number of campaign and non-campaign answers to Improve water quality and availability questions 19 to 23

Question	19	20	21	22	23
Campaign responses	6,286 (88%)	6,222 (95%)	4 (0%)	62 (18%)	22 (6%)
Non-campaign responses	828 (12%)	318 (5%)	829 (100%)	281 (82%)	330 (94%)
All responses	7,114	6,540	833	343	352

Table 11: Number of campaign and non-campaign answers to Improve water quality and availability questions 24 to 29

Question	24	25	26	27	28	29
Campaign responses	6,227 (88%)	6151 (95%)	6,286 (88%)	6,222 (94%)	6,276 (88%)	6,143 (94%)
Non-campaign responses	835 (12%)	326 (5%)	817 (12%)	407 (6%)	824 (12%)	386 (6%)

Question	24	25	26	27	28	29
All responses	7112	6,477	7,103	6,629	7,100	6,529

Abandoned metal mines target

Question 19. Do you agree or disagree with the level of ambition proposed for an abandoned metal mines target?

There were 7,114 answers to this question, which are shown in Table 10, which included campaign responses identified with the Friends of the Earth (2,428), Greenpeace (47), RSPB (1) and the Woodland Trust (3,810).

Table 12: Number of campaign and non-campaign answers to question 19

Response	Agree	Disagree	Don't know	Total
Campaign responses	97 (2%)	6,189 (98%)	0 (0%)	6,286
Non-campaign responses	372 (45%)	258 (31%)	198 (24%)	828
All Responses	469 (7%)	6,447 (91%)	198 (3%)	7,114

Of the 7,114 answers to this question, 7% agreed with the level of ambition of the abandoned metal mines target, and 91% disagreed. A small majority of non-campaign consultees agreed with the ambition, where a definitive answer was provided (45%, compared to 31% who did not agree). Most campaign answers disagreed (98%). Proportionately, more academics, businesses, professional bodies and public sector organisations agreed with the ambition of the abandoned metal mines target. More than half NGOs who gave an answer, did not agree with the ambition.

Question 20. (If disagree) What reasons can you provide for why government should consider a different level of ambition?

There were 6,540 answers who gave a reason why the government should consider a different level of ambition. The 2 main explanations given by them were a lack of ambition and delivery and regulation concerns. Friends of the Earth (2,364), Greenpeace (47), RSPB (1) and the Woodland Trust (3,810) campaigns responded to this question.

The 2 main concerns raised by respondents were target ambition and delivery (99% of responses) and delivery and regulatory concerns (65% of answers), for non-campaign consultees the concerns were target ambition (76% of non-campaign answers) and target definition and scope (29% of non-campaign answers).

Target ambition

Most answers (99%) raised concerns about target ambition, and this was a concern for a majority (76%) of non-campaign answers also.

The Rivers Trust agreed with the ambition of the abandoned metal mines target and supported the use of nature-based solutions (where feasible) and monitoring if it is sufficiently rigorous. They asked why a reduction of 50% was proposed and also suggested that there could be pollution targets for pollution from towns, cities, transport and non-native species, which all have a greater effect on water bodies than metal mines.

Delivery and Regulation

A majority of all answers (65%) raised concerns regarding delivery and regulation. For a majority (63% of 6,540) of consultees these were related to monitoring concerns.

Target definition and scope

A minority of non-campaign answers (29%) mentioned the target definition and scope, most of these suggested the government should set an outcome-based target. Consultees from the Friends of the Earth Campaign indicated that the mining and other water targets could be met but the overall quality may not improve without an overall target for England's waterways.

Nutrient pollution from agriculture

Question 21. 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?

There were 833 answers to this question, which are shown in Table 11 and include 4 individual answers identified with the Friends of the Earth (2), Greenpeace (1), and the RSPB (1) campaigns.

Table 13: Number of campaign and non-campaign answers to question 21

Response	Agree	Disagree	Don't know	Total
Campaign responses	3 (75%)	0 (0%)	1 (25%)	4

Non-campaign responses	440 (53%)	248 (30%)	141 (17%)	829
All responses	443 (53%)	248 (30%)	142 (17%)	833

Of the 833 answers to this question, a small majority (53%) agreed that setting out ambitions for reducing nutrient pollution from agriculture in individual catchments would strengthen the national target, and 30% disagreed. Proportionately, professional bodies, businesses and public sector organisations mainly agreed that setting out individual catchment targets would strengthen the national target. A greater number of academics, and more than half of NGOs who provided an answer, also agreed.

Question 22. (If disagree) Why don't you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target?

There were 343 answers which gave a reason why they didn't think that ambitions for reducing nutrient pollutions from individual agricultural catchments will strengthen the national target. Friends of the Earth (61) and the Woodland Trust (1) campaigns responded to this question.

Delivery and regulation

A minority (28%) of answers raised delivery and regulatory concerns. For a small minority there were concerns around enforcement and accountability, a small minority (12%) also raised concerns about monitoring.

Target definition and scope

A minority (24%) of answers were concerned about the target and definition and scope. For small minorities of respondents these included concerns on the clarity and specificity of the targets (20%), the method of measuring targets (5%) and that the government should also consider non-agricultural sources (4%).

Other

A minority (45%) of those who left a comment for this question did not provide a reason for why they don't think using individual catchments will strengthen the national target. For example, they related to a lack of ambition of the target rather than the effectiveness of catchments.

Question 23. (If agree) Why do you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target? What factors should the government consider when setting these ambitions

There were 352 answers which gave a reason for agreeing that reducing nutrient pollution from agriculture in individual catchments would strengthen the national target. Friends of

the Earth (21) and RSPB (1) campaigns answered this question. A minority of respondents (24%) agreed that using a catchment approach will strengthen the national target. Small minorities of answers agreed with the effectiveness of the target because they allow flexibility (14%) and because they assist in the delivery of targets (10%).

Southern Water said, “An ambition for reducing nutrient pollution from agriculture in individual catchments will strengthen Southern Waters ability to address catchment-based risks.”

However, large minorities of responses also raised additional concerns involving the delivery and regulation of the target (35%) as well as its definition and scope (29%).

Nutrient pollution from wastewater

Question 24. 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?

There were 7,112 answers to this question, which are shown in Table 12 and include campaign responses identified with the Friends of the Earth (2,419), Greenpeace (47), RSPB (1) and the Woodland Trust (3,810).

Table 14: Number of campaign and non-campaign answers to question 24

Response	Agree	Disagree	Don't know	Total
Campaign responses	152 (2%)	6,125 (98%)	0 (0%)	6,277
Non-campaign responses	369 (44%)	247 (30%)	219 (26%)	835
All responses	521 (7%)	6,372 (90%)	219 (3%)	7,112

Of the 7,112 answers to this question, 90% disagreed that the target provides flexibility, and 7% agreed. More consultees whose responses were not linked with a campaign agreed (44%) with the flexibility of the target than disagreed (30%). Most (98%) responses that were part of a campaign did not agree. Proportionately, more public sector organisations, businesses and professional bodies agreed that the proposed target provided flexibility. A greater number of academics, and more than half NGOs who provided an answer disagreed.

Question 25. (If disagree) What reasons can you provide for why the target doesn't give this flexibility?

There were 6,477 answers, including campaign responses from Friends of the Earth (2,293), Greenpeace (47), the Woodland Trust (3,810), and RSPB (1) who gave a reason why they thought the target does not provide flexibility for water companies to use best available strategies to reduce phosphorous pollution.

Target ambition

Predominantly (97%), responses raised concerns regarding the ambition of the target with most suggesting a general increase in ambition. A small minority of these answers (5%) suggested the target should be achieved earlier. Amongst the non-campaign answers, small numbers said the target should be achieved earlier (15% of 326 non-campaign answers) and that it should be higher (10% of 326 non-campaign answers).

Delivery and regulation

A majority of answers (65%) mentioned delivery and regulation concerns, including a majority (63%) who identified monitoring as their primary concern, with enforcement and accountability concerns accounting for a small number of responses (3%). However, non-campaign answers raised enforcement and accountability concerns most frequently (20% of non-campaign answers), followed by monitoring (10% of non-campaign answers). A small number also highlighted nature-based solutions (6% of non-campaign answers), the existing catchment-based approach (5% of non-campaign answers) and financial and environmental costs (2% of non-campaign answers) as reasons for disagreeing.

Suite of Nutrient Targets

We also asked 2 questions about the level of ambition proposed for the suite of nutrient targets.

Question 26. Do you agree or disagree with the level of ambition proposed for the nutrient targets?

There were 7,103 answers to this question, which are shown in Table 13, which included campaign responses identified with the Friends of the Earth (2,428), Greenpeace (47), RSPB (1) and the Woodland Trust (3,810).

Table 15: Number of campaign and non-campaign answers to question 26

Response	Agree	Disagree	Don't know	Total
Campaign responses	97 (2%)	6,189 (98%)	0 (0%)	6,286
Non-campaign responses	301 (37%)	352 (43%)	164 (20%)	817
All responses	398 (6%)	6,541 (92%)	164 (2%)	7,103

Of the 7,103 answers to this question, 6% agreed with the level of ambition of the nutrient targets, and 92% disagreed. More of the non-campaign responses disagreed (43%) with the ambition than agreed (37%) and most of the campaigns (98%) disagreed with it. A greater proportion of businesses and public sector organisations agreed with the ambition of the nutrient targets than disagreed. However, academics, and NGOs were more likely to disagree than agree. More than half professional bodies also disagreed.

Severn Trent Water welcomed “the range and intent of the Environment Act proposed targets and believe they represent an important step to a stronger environment. We particularly support the government’s ambitious target to reduce phosphorus loadings from treated wastewater by 80 percent by 2037 (against a 2020 baseline).”

Question 27. (If disagree) What reasons can you provide for why government should consider a different level of ambition?

There were 6,629 respondents who gave a reason why the government should consider a different level of ambition for the nutrient targets. Friends of the Earth (2,362), Greenpeace (47), RSPB (3) and the Woodland Trust (3,810) campaigns answered this question.

Target ambition

Most (98%) respondents mentioned the need to increase the ambition of the targets. A small minority proposed bringing the timelines forward (7%) and setting higher targets (3%). Amongst the non-campaign answers, a small majority (52% of 817) supported earlier achievement and a minority (33% of 817) supported setting a higher target.

Delivery and regulation

A majority of respondents (64%) raised concerns about the delivery and regulation of the targets. A majority (62%) focussed on the ability to monitor the target with a small minority (3%) concerned with the enforcement and accountability of delivering the target.

Water Demand target

Question 28. Do you agree or disagree with the level of ambition proposed for a water demand target?

There were 7,100 answers to this question, which are shown in Table 14, which included responses identified with the Friends of the Earth (2,419), Greenpeace (47), and the Woodland Trust (3,810) campaigns.

Table 16: Number of campaign and non-campaign answers to question 28

Response	Agree	Disagree	Don't know	Total
Campaign responses	152 (2%)	6,124 (98%)	0 (0%)	6,276
Non-campaign responses	347 (42%)	293 (36%)	184 (22%)	824
All responses	499 (7%)	6,417 (90%)	184 (3%)	7,100

Of the 7,100 answers to this question, 7% agreed with the level of ambition of the target to reduce the use of public water supply in England per head of the population, and 90% disagreed. There were 824 non-campaign answers, 42% agreed with the level of ambition of the demand target and 36% disagreed. Most campaign responses did not agree. Proportionately, a dominant number of businesses and public sector organisations who responded to the question agreed with the ambition of the water demand target. Whereas professional bodies and academics were more likely to disagree. More than half of the NGOs who responded disagreed with the ambition.

Question 29. (If disagree) What reasons can you provide for why government should consider a different level of ambition?

In total, there were 6,529 answers that gave a reason why the government should consider a different level of ambition. Friends of the Earth (2,286), Greenpeace (47) and the Woodland Trust (3,810) campaigns responded to this question.

Target ambition

Most (96%) answers to this question stated concerns with the level of ambition of the target. A small minority (4%) of consultees were in favour of an earlier timeline, and for setting a higher target (1% of responses). Non-campaign answers followed a similar pattern, with a small minority (13% of 386) supporting an earlier date and a higher target (7% of 386). The OEP also suggested the target should focus on unsustainable water abstraction and suggested an absolute metric rather than a relative metric (for example, dividing by population).

Delivery and regulation

A majority (63%) of responses raised delivery and regulation concerns. These concerns specifically included the ability to monitor the target (61%), followed by enforcement and accountability concerns (4%).

Woodland cover

Proposed target included in the consultation:

Increase tree canopy and woodland cover from 14.5% to 17.5% of total land area in England by 2050.

Table 17: Number of campaign and non-campaign answers to Woodland cover questions

Question	30	31	32	33	34
Campaign responses	3 (0%)	2 (0%)	3,798 (82%)	6,294 (88%)	5,857 (87%)
Non-campaign responses	830 (100%)	814 (100%)	828 (18%)	843 (12%)	837 (13%)
All responses	833	816	4,626	7,137	6,694

Question 30. Do you agree or disagree with the proposed metric for a tree and woodland cover target? (Agree, Disagree or Don't know)

There were 833 answers to this question, which are shown in Table 16 and included 3 individual campaign answers identified with the Friends of the Earth (2) and Greenpeace (1).

Table 18: Number of campaign and non-campaign answers to question 30

Response	Agree	Disagree	Don't know	Total
Campaign responses	1 (33%)	2 (67%)	0 (0%)	3
Non-campaign responses	365 (44%)	309 (37%)	156 (19%)	830
All responses	366 (44%)	311 (37%)	156 (19%)	833

Of the 833 answers to this question, 44% agreed with the proposed metric for the target, and 37% disagreed. Proportionately, academic responses, NGOs and professional bodies were more likely to agree than disagree with the proposed metric. Generally, businesses and public sector organisations also agreed.

Question 31. Do you agree or disagree that short rotation coppice and short rotation forestry plantations should be initially excluded from a woodland cover target?

There were 814 answers to this question, which are shown in Table 17, which included campaign answers identified with the Friends of the Earth (1) and Greenpeace (1).

Table 19: Number of campaign and non-campaign answers to question 31

Response	Agree	Disagree	Don't know	Total
Campaign responses	2 (100%)	0 (0%)	0 (0%)	2
Non-campaign responses	550 (68%)	87 (11%)	175 (22%)	812
All responses	552 (68%)	87 (11%)	175 (21%)	814

Of the 814 answers to this question, 68% agreed that short rotation coppice and short rotation forestry plantations should be initially excluded from the woodland cover target, and 11% disagreed. Generally, academic organisations, businesses, NGOs and public sector organisations, and a greater number of professional bodies agreed with the exclusions.

Question 32. 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?

There were 4,626 answers to this question, which are shown Table 18 which included campaign answers identified with the Friends of the Earth (2), Greenpeace (1), and the Woodland Trust (3,795).

Table 20: Number of campaign and non-campaign answers to question 32

Response	Agree	Disagree	Don't know	Total
Campaign responses	3,797 (99.97%)	1 (0.03%)	0 (0%)	3,798
Non-campaign responses	625 (75%)	97 (12%)	106 (13%)	828
All responses	4,422 (96%)	98 (2%)	106 (2%)	4,626

Of the 4,626 answers to this question, 96% agreed with the proposed inclusion of trees in woodlands, as well as trees in hedgerows, orchards, in fields, and in towns and cities, and 2% disagreed. The majority of the non-campaign answers agreed with this inclusion, as did most of the campaign consultees. On the whole, academic organisations, businesses, NGOs, public sector organisations and professional bodies agreed with the target.

Question 33. Do you agree or disagree with our proposed level of ambition for a tree and woodland cover target?

There were 7,137 answers to this question, which are shown in Table 19, which included campaign answers identified with the Friends of the Earth (2,419), Greenpeace (47), RSPB (1), and the Woodland Trust (3,827).

Table 21: Number of campaign and non-campaign answers to question 33

Response	Agree	Disagree	Don't know	Total
Campaign responses	152 (2%)	6,142 (98%)	0 (0%)	6,294
Non-campaign responses	290 (34%)	430 (51%)	123 (15%)	843
All responses	442 (6%)	6,572 (92%)	123 (2%)	7,137

Of the 7,137 answers to this question, 6% agreed with the level of ambition of the target, and 92% disagreed. Most campaign responses and a small majority of non-campaign answers disagreed with the ambition. Businesses and public sector organisations were more likely to agree with the ambition of the target. Proportionately more academics and NGOs, including more than half of the professional bodies who responded disagreed.

Question 34. (if disagree) What reasons can you provide for why the government should consider a different level of ambition?

There were 6,694 answers that gave a reason why the government should consider a different level of ambition. Friends of the Earth (2,283), Greenpeace (47), RSPB (2) and the Woodland Trust (3,833) campaigns responded to this question.

Target ambition

Most (98%) answers referred to target ambition, the most popular theme being general statements on increase the level of ambition. A small majority of answers (59%) raised concerns over the ambition level being sufficient to mitigate climate change or achieve the UK's 2050 net zero target. A small majority (58%) also suggested that the ambition was too low to achieve biodiversity targets and therefore would not stop declines by 2030. A small number (5%) of answers called for a higher target, ranging from 17% to 50% cover.

CONFOR highlighted the role woodlands can play in meeting more ambitious targets. "Using more timber products will have a positive difference for a more sustainable built environment, enabling it to contribute towards net zero." The NFU felt the target, while ambitious, could be difficult to reach. They said "An increase in tree canopy and woodland cover from 14.5% to 17.5% equates to 415,000 hectares of tree cover by 2050, approximately 15,000 hectares of trees a year. This is extremely ambitious, if not unachievable" when compared to current planting rates. The RSPB responded, "We agree with the level of ambition but believe the metric should include differentiated targets to ensure expansion is in the right places, for the right reasons, with the right trees, both now and in the future. Targets for existing woodland management to improve condition are also needed as these measures will be at least as effective as new woodland creation." The Wildlife Trusts made similar points that woodland should only be created in suitable areas and shouldn't displace other valuable habitats, noting "We would not be able to support a proposal whereby the vast majority of a habitat target was met through a single habitat." The OEP welcomed the ambition of the target but cautioned that the government should look to manage delivery risks and incentivise landowners.

Target delivery and scope

A majority of answers (61%) disagreed due to the target definition and scope. The leading themes were the need for a connection with existing woodlands (58%) and different target metrics (57%). A small number of consultees (3%) called for greater clarity and specificity. The RSPB added "Targets for existing woodland management to improve condition are also needed as these measures will be at least as effective as new woodland creation."

Resource efficiency and waste reduction

Table 22: Number of campaign and non-campaign answers to Resource efficiency and waste reduction questions 30 to 39

Question	35	36	37	38	39
Non- campaign responses	874 (1%)	453 (1%)	630 (99.8%)	239 (98 %)	799 (99.9%)
Campaign responses	66,355 (99%)	66,182 (99%)	1 (0.2%)	5 (2%)	1 (0.1 %)
All responses	67,229	66,635	631	244	800

Table 23: Number of campaign and non-campaign answers to Resource efficiency and waste reduction questions 40 to 44

Question	40	41	42	43	44
Non- campaign responses	871 (12%)	390 (6%)	817 (99%)	225 (99.6%)	352 (72 %)
Campaign responses	6,284 (88 %)	6,247 (94%)	12 (1%)	1 (0.4%)	137 (28 %)
All responses	7,155	6,637	829	226	489

Resource efficiency and waste reduction

Summary of proposed target included in the consultation:

Reduce residual waste (excluding major mineral wastes) kg per capita by 50% by 2042 from 2019 levels. It was proposed to measure this as a reduction from the 2019 level, which was estimated to be approximately 560 kg per capita (updated evidence following consultation shows this to be 574kg per capita).

Question 35. Do you agree or disagree with the proposed scope of the residual waste target being ‘all residual waste excluding major mineral wastes’?

There were 67,229 answers to this question, which are shown in Table 21, which included campaign answers identified with the Big Plastic Count (60,079), Friends of the Earth (2,419), Greenpeace (47), and the Woodland Trust (3,810).

Table 24: Number of campaign and non-campaign answers to question 35

Response	Agree	Disagree	Don't know	Total
Campaign responses	110 (0.2%)	66,245 (99.8%)	0 (0%)	66,355
Non-campaign responses	424 (49%)	263 (30%)	187 (21%)	874
All responses	534 (0.8%)	66,508 (98.9%)	187 (0.3%)	67,229

Of the 67,229 answers to this question, 99% disagreed with the scope of the residual waste reduction target, and 1% agreed. There was a substantial number of answers to this question due to the Big Plastic Count campaign attracting 60,079 answers. In addition, replies were received from the Woodland Trust (3,810) and Friends of the Earth campaigns (2,419). Most campaign answers disagreed with the scope of the target (almost 100%). In contrast, 49% of the non-campaign respondents agreed with the scope of the waste reduction target, and 30% did not agree. Proportionately, more businesses, public sector organisations and professional bodies agreed with the scope of the target. NGOs were also more likely to agree than disagree. However, more than half of the academics who responded disagreed with the scope.

Question 36. (If disagree) What reasons can you provide for why the government should consider a different target scope?

There were 66,635 answers that gave a reason why the government should consider a different target scope for the waste reduction target. They were largely driven by campaign answers, especially from the Big Plastic Count campaign (60,079), which generated 60,079 calls for a separate plastic waste target. The other campaigns were Friends of the Earth (2,355), Greenpeace (47), RSPB (1) and the Woodland Trust (3,810).

Most who responded to this question raised concerns with the target ambition (66,544 or almost 100%) and with the export of recycling or waste (90%). These were largely driven by campaign responses, especially from the Big Plastic Count (See Annex D). The Big Plastic Count campaign included 60,079 calls for a separate plastic waste target. Greenpeace campaign responses also included a suggestion for “standalone targets to cut single-use plastic in half by 2025 and almost entirely eliminates single-use plastic in 15 years.” Greenpeace campaign responses also called for a ban on plastic exports and

implementing “an all-in deposit return scheme” and to introduce “extended producer responsibility.”

The Environmental Services Association (ESA) agreed with the residual waste reduction target scope. In their response they suggested that ferrous metals removed from bottom ash, which have been put through incineration or used in energy recovery and then sent for recycling, should be excluded from the scope of the target, both in terms of metals and aggregates. The ESA and Aldersgate Group both suggested that the residual waste reduction target should include major mineral waste. The Aldersgate group reasoned that a “limitation with only having a residual waste target in isolation is that it is unlikely to sufficiently incentivise the development of policies that focus on the earlier stages of the product and infrastructure lifecycle and drive better product and infrastructure design.”

Question 37. Do you agree or disagree that our proposed method of measuring the target metric is appropriate?

There were 831 answers to this question, which included one campaign response identified with the Greenpeace campaign.

Table 25: Number of campaign and non-campaign answers to question 37

Response	Agree	Disagree	Don't know	Total
Campaign responses	1 (100%)	0 (0%)	0 (0%)	1
Non-campaign responses	367 (44%)	182 (22%)	281 (34%)	830
All responses	368 (44%)	182 (22%)	281 (34%)	831

Of the 831 answers to this question, 44% agreed that the proposed method of measuring the target is appropriate, and 22% disagreed. The one campaign response received for this question agreed with the measurement method, as did the majority (67%) of non-campaign respondents who provided a definitive answer (agreed or disagreed). Amongst the organisations which responded, proportionately more businesses agreed with the proposed method. NGOs and public sector organisations were also more likely to agree than disagree. However, academics and professional bodies were more likely to disagree.

Question 38. (If disagree) What reasons or potential unintended consequences can you provide or for see for why the government should consider a different method?

There were 244 answers that gave a reason or potential unintended consequence for why the government should consider a different method of measuring the residual waste reduction target. Some answers associated with the Friends of the Earth (5) campaign responded to this question.

Target definition and scope

A minority of answers (35%) disagreed with the treatment-based definition of residual waste. A number of these called for the focus to be on reducing waste at source rather than at treatment stage. As an example, one respondent stated “We need to address the sources of residual waste rather than the waste per unit of population. The focus needs to be in the initial production of the waste and further upstream in the process.”

Units of measurement

A minority (35%) of answers stated concerns with the units of measurements. A minority of answers also suggested that additional or different metrics are required (27%), and a small minority stated that a metric that better addresses environmental impact would be more appropriate (11%). Of those suggesting additional or different metrics are required, some responses referred to the need to set sector-specific rules or targets, which may be more appropriate for business or commercial waste streams. Others mentioned a preference for a per household metric rather than a per capita metric, which is more in line with how data is currently collected.

Question 39. 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?

There were 800 answers to this question, which are shown in Table 23, which included one campaign response identified with Greenpeace.

Table 26: Number of campaign and non-campaign answers to question 39

Response	Agree	Disagree	Don't know	Total
Campaign responses	1 (100%)	0 (0%)	0 (0%)	1
Non-campaign responses	666 (83%)	26 (3%)	107 (13%)	799
All responses	667 (83%)	26 (3%)	107 (13%)	800

Of the 800 answers to this question, 83% agreed that local authorities should have a legal requirement to report their waste data, and 3% disagreed. The one campaign answer agreed, as did most of the non-campaign answers. There was a clear consensus amongst sectors for this question with most responding organisations agreeing with the proposed reporting requirement for local authorities, where a definitive answer (agree or disagree) was provided.

Question 40. Do you agree or disagree with the level of ambition proposed for a waste reduction target?

There were 7,155 answers to this question, which included campaign responses identified with the Big Plastic Count (1), Friends of the Earth (2,426), Greenpeace (47), and the Woodland Trust (3,810).

Table 27: Number of campaign and non-campaign answers to question 40

Response	Agree	Disagree	Don't know	Total
Campaign responses	59 (1%)	6,225 (99%)	0 (0%)	6,284
Non-campaign responses	356 (41%)	319 (37%)	196 (23%)	871
All responses	415 (6%)	6,544 (91%)	196 (3%)	7,155

Of the 7,155 answers to this question, 6% agreed with the level of ambition of the waste reduction target, and 91% disagreed. Most of the consultees from the Woodland Trust (3,810) and Friends of the Earth (2,367) and other campaigns (48) did not agree with the target. However, more non-campaign answers agreed with the target (41%) than disagreed (37%). Proportionately, more businesses and public sector organisations agreed with the ambition level of the waste reduction target. Whereas academics, professional bodies and NGOs were more likely to disagree with the ambition.

Question 41. (If disagree) What reasons can you provide for why the government should consider a different level of ambition?

There were 6,638 answers to this question, this included campaign responses identified from Friends of the Earth (2,389), Greenpeace (47), Big Plastic Count (1) and the Woodland Trust (3,810).

Target ambition

Most (99%) answers expressed a wish to see an increase in the target ambition. A small minority of answers said there should be a greater focus on reduction of waste at source and a small number said 2042 is too late, 50% is too low and the scope is too narrow.

Other themes

A majority of answers (63%) raised delivery and regulation concerns.

Most campaign answers identified ability to monitor the target as their main delivery and regulation concern. However, there were a higher number of non-campaign answers

focusing on behavioural changes needed (13% of 391) and enforcement and accountability concerns (11% of 391) rather than monitoring concerns (7% of 391).

Resource productivity

Summary of proposed target included in the consultation:

The government has set a strategic ambition to at least double resource productivity by 2050. We sought views via the consultation to inform future work on developing this target, alongside exploring our proposal to measure resource productivity as a ratio of economic output (gross domestic product) in money value to raw material consumption (excluding fossil energy carriers) estimated by material weight.

Question 42. Do you agree or disagree with our proposed metric for considering resource productivity?

There were 829 answers to this question, which are shown in Table 25, these included campaign answers identified with Greenpeace (11) and Friends of the Earth (1).

Table 28: Number of campaign and non-campaign answers to question 42

Response	Agree	Disagree	Don't know	Total
Campaign responses	0 (0%)	11 (92%)	1 (8%)	12
Non-campaign responses	297 (36%)	160 (20%)	360 (44%)	817
All responses	297 (36%)	171 (21%)	361 (44%)	829

Of the 829 answers to this question, 36% agreed with the proposed metric for considering resource productivity, and 21% disagreed. Most answers were from non-campaign consultees, and these responses were more likely to agree with the metric than disagree with it. Proportionately, businesses and public sector organisations agreed with the resource productivity metric. A suggestion for improvement of the metric came from the Environmental Services Association (ESA), regarding consideration of additional measurements including those that may track economic and social prosperity. A greater number of the academics and more than half of the professional bodies and NGOs who responded disagreed.

Question 43. (If 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?

There were 226 answers that gave a reason or potential unintended consequence for why the government should consider a different metric, including one response associated with the Friends of the Earth campaign.

A majority (67%) of answers to this question were categorised as 'Other' (see more detail below). A minority (21%) of answers to this question raised an issue with the economic measure proposed. Small minorities disagreed with the type of economic metric used (15%) and with the inclusion of an economic measure (6%).

Only a small number of answers (9%) raised concerns with the environmental measure, with the majority of those disagreeing with the type of metric use.

Of the small minority (18%) of answers that disagreed due to the materials considered in the metric, small numbers suggested focusing on certain materials (10%), disagreed with excluding fossil fuels from the metric (6%), or disagreed with including certain materials (4%).

Answers were categorised as 'Other' due to either providing comments that were not classified as reasons or potential unintended consequences for considering a different productivity metric. 'Other' answers also included additional points raised that were not directly related to the economic or environmental measure, materials, sectors, or unintended consequences. These included concerns about the inability to rely on companies to measure their own impact, including additional indicators and considering the full lifecycle of the resource.

The ESA agreed with the proposed metric but suggested the government considers other measures that track economic and social prosperity.

Question 44. 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.

489 consultees gave an answer to indicate the most effective policy for meeting a productivity target. Friends of the Earth (118), Greenpeace (1) and the Big Plastic Count (18) campaigns answered this question.

Types of policy interventions

Of the answers that mentioned a specific policy type would be most effective, 95% mentioned regulatory policies, followed by 31% suggesting tax-price based policies.

Half (50%) of those suggesting regulatory policies would be most effective indicated these should be targeted at the food and drink sector, and a minority (24%) of those suggesting

tax-price based policies also indicated the food and drink sector. Other policy types suggested by respondents included construction, electronics, vehicles, and furniture policies. Some answers did not specify a sector.

Product-specific or sector-specific policies

Of the 216 answers that indicated whether product-specific or sector-specific policies would be most effective, 61% (of 216) mentioned sector-specific policies, while 58% (of 216) mentioned product-specific policies.

Geographic scale

A minority of answers to this question (33%) specified the geographic scale of which these policies should operate. Most suggested the national scale.

Air quality

Proposed targets included in the consultation:

Annual Mean Concentration Target – a PM2.5 target of 10 micrograms per cubic metre (µg per m³) to be met across England by 2040.

Population Exposure Reduction Target – a 35% reduction in population exposure to PM2.5 by 2040 (compared to a base year of 2018).

Table 29: Number of campaign and non-campaign answers to Air quality questions

Question	45	46	47	48
Campaign responses	12,140 (93%)	10,862 (92%)	12,140 (93%)	11,244 (94%)
Non-campaign responses	908 (7%)	982 (8%)	854 (7%)	680 (6%)
All responses	13,048	11,844	12,994	11,924

Question 45. Do you agree or disagree with the level of ambition proposed for a PM2.5 concentration target?

There were 13,048 answers to this question, which are shown in Table 27, which included campaign answers identified with Asthma + Lung UK (5,856), Friends of the Earth (2,431), Greenpeace (47), and the Woodland Trust (3,806).

Table 30: Number of campaign and non-campaign answers to question 45

Response	Agree	Disagree	Don't know	Total
Campaign responses	711 (6%)	11,291 (93%)	138 (1%)	12,140
Non-campaign responses	281 (31%)	457 (50%)	170 (19%)	908
All responses	992 (8%)	11,748 (90%)	308 (2%)	13,048

Of the 13,048 answers to this question, 8% agreed with the level of ambition of the target, and 90% disagreed. The majority of campaign-related answers disagreed with the ambition of the target, which included answers associated with the Asthma + Lung UK (5,110), the Woodland Trust (3,806), the Friends of the Earth (2,328) and the Greenpeace (47) campaigns. More non-campaign consultees disagreed with the ambition than agreed with it. Proportionately, more academics, NGOs, professional bodies and public sector organisations disagreed with the ambition of the Annual Mean Concentration Target (AMCT). However, a greater number of businesses agreed with it.

Question 46. (If disagree) What reasons can you provide for why the government should consider a different level of ambition?

There were 11,844 answers that gave a reason why the government should consider a different level of ambition. Asthma + Lung UK (5,105), Friends of the Earth (2,358), Greenpeace (47) and the Woodland Trust (3,812) campaigns answered this question.

Target ambition

Predominantly respondents who disagreed with target ambition stated a general lack of target ambition as the reason (94%). A minority (33%) mentioned that the proposed ambition is too low to improve health outcomes, and a minority also suggested the target be achieved earlier (33%). A small minority (6%) of answers called for a more ambitious target concentration than 10µg per m³. Many answers, including from The Clean Air Fund, cited research undertaken by the Environmental Research Group at Imperial College London stating that a more ambitious target is achievable in a shorter timeline. The Clean Air Fund also raised concerns, along with others, that the target would be considered met overall if it was met in 3 out of the 4 previous years. The OEP were concerned that although ambitious, the proposed 2040 deadline should be reconsidered.

Other themes

- a minority of answers (33%) stated delivery and regulation concerns. For a minority (33%) of answers, concerns focussed on monitoring, including the number of sites and their spread across the country. Some concerns were raised around the

method of monitoring, including the ability to see local impacts, and data availability for the public

- a small number of answers (14%) raised concerns that the target is not aligned with other environmental issues and other air quality guidelines, including WHO Air Quality Guidance. Economically, it was raised in a small minority (13%) of responses that costs from health impacts would increase if the target were too low
- proportionately overall, a small number of answers (9%) mentioned emission sources and a small minority of answers (8%) specifically highlighted transport sources. However, the majority of those highlighting transport sources were from campaigns (92% of those who mention transport sources) compared to only a small number of non-campaign answers (8% of those who mention transport sources). The next most mentioned emissions source was domestic burning sources, making up less than 1% of campaign answers and 10% of non-campaign answers. Other emissions sources cited were industry sources, other sources, and non-road mobile machinery
- There was concern that the target would be considered met overall if the target was met in 3 out of 4 previous years. The Clean Air Fund stated this compliance metric is a “major caveat to (the government’s) legal duty to comply with the PM_{2.5} concentration target”

Question 47. Do you agree or disagree with the level of ambition proposed for a population exposure reduction target?

There were 12,994 answers to this question, which are shown in Table 28, which included campaign answers identified with Asthma + Lung UK (5,856), Friends of the Earth (2,431), Greenpeace (47), and the Woodland Trust (3,806).

Table 31: Number of campaign and non-campaign answers to question 47

Response	Agree	Disagree	Don't know	Total
Campaign responses	593 (5%)	11,379 (94%)	168 (1%)	12,140
Non-campaign responses	278 (33%)	383 (45%)	193 (23%)	854
All responses	871 (7%)	11,762 (91%)	361 (3%)	12,994

Of the 12,994 answers to this question, 7% agreed with the level of ambition of the target and 91% disagreed. Campaign answers were received from Asthma and Lung UK (5,856), the Woodland Trust (3,806), Friends of the Earth (2,431), and Greenpeace (47), and most (94%) disagreed with the target. However, a small minority of Asthma + Lung UK (490) consultees agreed with the target. Of the non-campaign answers, 33% agreed with the ambition, and 45% disagreed.

Proportionately, public sector organisations were more likely to disagree with the population exposure target than to agree with it. A greater number of academics, NGOs and professional bodies also disagreed with the target in comparison to those who agreed. Overall, businesses tended to agree with the target.

Question 48. (If disagree) What reasons can you provide for why the government should consider a different level of ambition?

There were 11,924 respondents who gave a reason why the government should consider a different level of ambition. Asthma + Lung UK (5,279), Friends of the Earth (2,342), Greenpeace (47), RSPB (1) and the Woodland Trust (3,812) campaigns responded to this question.

Target ambition

The primary reason for disagreeing with the targets (91%) was linked to the target ambition, and this was the explanation provided by virtually all of the Woodland Trust and Friends of the Earth campaign responses. Most called for a general increase in ambition while a small number wanted the timeline to be reduced. Some respondents referencing higher ambition felt the target is too low to improve health outcomes. The Sustainable Transport Alliance, with others, were concerned that the target would not address pollution hotspots and called for improvements to monitoring.

Other themes

- a minority (44%) of answers raised concerns with monitoring which included responses questioning the number of proposed monitoring sites and measurement of the targets
- a small number (14%) of answers mentioned emission sources and in particular highlighted transport emissions. Specific examples mentioned in responses included domestic burning, industry, other and non-road mobile machinery sources
- a small minority (10%) of answers indicated that the target level is not aligned with other environmental issues and other air quality guidelines, specifically the WHO guidelines
- 'other' answers included increasing green space and tree cover and targeting all areas or those areas that are most polluted. A number of answers did not address the target question

Further themes raised in the consultation responses (AMCT and PERT)

Below is a list of themes raised within the responses, but less frequently than those summarised above. All have been given due consideration:

- a number of respondents called for measures to meet the target to be aligned to the Net Zero Strategy:
 - Defra is working collaboratively across government in order to ensure that proposed measures to improve air quality are well aligned to the aspirations and measures of the Net Zero Strategy

- alternative targets, such as those for ozone, ammonia, NO₂, PM₁₀ and those of different averaging periods were suggested:
 - we have worked closely with internationally recognised experts to set targets which focus on health outcomes. For this reason, we have set targets for PM_{2.5}, the pollutant which will result in the greatest improvement to public health
- modelling was criticised for being overly pessimistic:
 - the modelling undertaken to inform the setting of the air quality targets was informed by internationally recognised experts. Any modelling covering long periods of time is challenging and needs to manage the uncertainties of anticipating technological and political developments and their effects on air quality. This is in order to satisfy the requirement of the Environment Act that the Secretary of State must be satisfied that the target can be met
- a consultation was called for on the approach to monitoring the targets:
 - a consultation on the approach to monitoring progress towards the targets is considered disproportionate, would slow down the roll-out of new monitoring equipment and lower the confidence in our ability to track immediate progress towards the target. Internationally recognised experts have been consulted to make sure that we are able to measure our progress towards the target in a consistent and proportionate way

Focus groups

- alongside the public consultation we held a series of focus groups of individuals and small and micro businesses to better understand the views of groups that less commonly engage with formal consultations. These found that participants felt that air quality was important and should be a priority for government. Some cited the benefits of improvements experienced during lockdown and highlighted urban areas and schools as areas of particular concern
- there was a perception that government and large businesses should be responsible for action to improve air quality, with concerns that actions focused on individuals could be unfair. Participants were receptive to measures involving green finance, incentivising cleaner resources such as electric vehicles and efficient heating, and awareness raising campaigns
- many participants wanted additional information on sources of air pollution and the action they could take to lower their contribution and/or reduce their personal exposure. Generally, groups were more open to action on domestic combustion, but were less enthused by measures focussed on private vehicle use

Annex B: Consultation questions and top-line results

- the Targets consultation received 181,003 responses
- closed-ended questions were analysed for sentiment.
- open-ended questions were categorised and analysed according to sentiment
- responses could address more than one category

Your name

Question 1. Your email address.

Question 2: Your organisation (if applicable)

Question 3: Whether you would like your response to be confidential (if yes, please state your reasons)

Confidentiality question

Question 4: Would you like your response to be confidential? (Yes or No)

Question 5: (If yes) Please give your reason.

Biodiversity on land

Question 6. 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'?

Table 32: Answers to question 6

Response	Campaign	Non-campaign	All responses
Agree	1	303	304
Disagree	4,405	480	4,885
Don't know	0	120	120
Total	4,406	903	5,309

Question 7. (If disagree with question 6) What additional indicators do you think may be necessary?

Table 33: Answers to question 7

Category	Campaign	Non-campaign	All responses
Protected sites	4,431	102	4,533
Outcome-based indicators (habitat)	4,344	24	4,368
Other	21	322	343
Stronger commitments on actions that benefit biodiversity	124	129	253
Indicator for specific species	61	52	113
Indicator for specific habitats	22	72	94
Woodland	18	9	27
Hedgerows	18	2	20
Localised biodiversity targets	0	13	13
Total responses	4,630	540	5,170

Question 8. Do you agree or disagree with the level of ambition of a 10% increase proposed for the long-term species abundance target?

Table 34: Answers to question 8

Answer	Campaign	Non-campaign	Petitions	All responses
Agree	81	227	0	308
Disagree	10,543	607	60,951	72,101
Don't know	0	89	0	89
Total	10,624	923	60,951	72,498

Question 9. (If disagree with Question 8) What reasons can you provide for why the government should consider a different level of ambition?

Table 35: Answers to question 9

Category	Campaign	Non-campaign	All respondents
Lack of ambition	10,562	630	11,192
Delivery and regulation concerns	4,108	89	4,197
Other priorities	3,817	49	3,866
Target definition and scope	259	48	307
Other	1	55	56
Barriers	13	29	42
Total responses	10,355	900	11,255

Question 10. 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?

Table 36: Answers to question 10

Answer	Campaign	Non-campaign	All responses
Agree	81	343	424
Disagree	6,208	391	6,599
Don't know	0	129	129
Total	6,289	863	7,152

Question 11. (If disagree with question 10) What reasons can you provide for why the government should consider a different level of ambition?

Table 37: Answers to question 11

Category	Campaign	Non-campaign	All responses
Lack of ambition	6,237	298	6,535
Target definition and scope	4457	113	4,570

Category	Campaign	Non-campaign	All responses
Delivery and regulation concerns	4,035	56	4,091
Other priorities	3,816	17	3,833
Other	0	119	119
Barriers	3	7	10
Total responses	10,387	610	10,997

Question 12. 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?

Table 38: Answers to question 12

Answer	Campaign	Non-campaign	All responses
Agree	81	295	376
Disagree	10,528	461	10,989
Don't know	0	111	111
Total	10,609	867	11,476

Question 13. (If disagree with question 12) What reasons can you provide for why the government should consider a different level of ambition?

Table 39: Answers to question 13

Category	Campaign	Non-campaign	All responses
Lack of ambition	10,559	466	11,025
Delivery and regulation concerns	4,042	69	4,111
Other priorities	3,818	53	3,871
Target definition and scope	223	131	354
Other	9	93	102
Barriers	6	6	12
Total responses	10,319	818	11,137

Question 14. Do you agree or disagree that all wildlife-rich habitat types should count towards the target?

Table 40: Answers to question 14

Answer	Campaign	Non-campaign	All responses
Agree	0	599	599
Disagree	1	111	112
Don't know	0	126	126
Total	1	836	837

Question 15. (if disagree or don't know to Question 14) Are there any habitat types that you think should not count towards the target?

Table 41: Answers to question 15

Category	Campaign	Non-campaign	All responses
Arable field margins	1	64	65
Other	0	36	36
Hedgerows	1	32	33
Traditional orchards	0	29	29
Estuarine and coastal water habitats	0	25	25
Grassland	0	25	25
Rivers and streams	0	25	25
Native woodland	0	22	22
Heathland	0	20	20
Lakes and ponds	0	19	19
Scrub	0	19	19
Peatland and wetlands	0	18	18
Wetlands	0	18	18
Peatland	0	3	3

Category	Campaign	Non-campaign	All responses
Total responses	1	122	123

Question 16. (If disagree or don't know to question 14) What reasons can you provide for why these habitats should not count towards the target?

Table 42: Answers to question 16

Category	Campaign	Non-campaign	All responses
Other	1	144	145
Habitats with low biodiversity value should not count	0	26	26
Non-native woodland should not count	0	13	13
Temporary habitats should not count	0	13	13
Measuring creation, restoration by area is not the best way to measure health of certain habitats	0	6	6
Overlap with other target, double counting	0	5	5
Habitats already well funded or protected should not count	0	3	3
Total responses	1	189	190

Biodiversity in the sea

Question 17. Do you agree or disagree with the level of ambition proposed for the Marine Protected Area target?

Table 43: Answers to question 17

Answer	Campaign	Non-campaign	All responses
Agree	152	325	477
Disagree	6,124	309	6,433
Don't know	0	192	192
Total	6,276	826	7,102

Question 18. (If disagree) What reasons can you provide for why the government should consider a different level of ambition?

Table 44: Answers to question 18

Category	Campaign	Non-campaign	All responses
Lack of ambition	6,135	320	6,455
Delivery and regulation concerns	3,898	84	3,982
Target definition and scope	106	57	163
Other	0	61	61
Negative sectoral impacts	0	7	7
Interference with the offshore wind programme	0	3	3
Total responses	6,140	388	6,528

Improve water quality and availability

Question 19. Do you agree or disagree with the level of ambition proposed for an abandoned metal mines target?

Table 45: Answers to question 19

Answer	Campaign	Non-campaign	All responses
Agree	97	372	469
Disagree	6,189	258	6,447
Don't know	0	198	198
Total	6,286	828	7,114

Question 20. (If disagree) What reasons can you provide for why government should consider a different level of ambition?

Table 46: Answers to question 20

Category	Campaign	Non-campaign	All responses
Lack of ambition	6,201	242	6,443
Delivery and regulation concerns	4,206	69	4,275
Target definition and scope	877	91	968
Other	0	56	56
Local influence	4	1	5
Total responses	6,222	318	6,540

Question 21. 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?

Table 47: Answers to question 21

Answer	Campaign	Non-campaign	All responses
Agree	3	440	443
Disagree	0	248	248
Don't know	1	141	142
Total	4	829	833

Question 22. (If disagree) Why don't you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target?

Table 48: Answers to question 22

Category	Campaigns	Non-campaign	All responses
Other	1	171	172
Delivery and regulation concerns	30	66	96
Target definition and scope	32	52	84

Category	Campaigns	Non-campaign	All responses
Catchment targets are ineffective	0	22	22
Total responses	62	281	343

Question 23. (If agree) Why do you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target? What factors should the government consider when setting these ambitions?

Table 49: Answers to question 23

Category	Campaign	Non-campaign	All responses
Other	1	126	127
Delivery and regulation concerns	2	120	122
Target definition and scope	19	84	103
Catchment targets are ineffective	0	85	85
Total responses	22	330	352

Question 24. 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?

Table 50: Answers to question 24

Answer	Campaign	Non-campaign	All responses
Agree	152	369	521
Disagree	6,125	247	6,372
Don't know	0	219	219
Total	6,277	835	7,112

Question 25. (if disagree) What reasons can you provide for why the target doesn't give this flexibility?

Table 51: Answers to question 25

Category	Campaign	Non-campaign	All responses
Lack of ambition	6,139	120	6,259
Delivery and regulation concerns	4,114	110	4,224
Other	0	138	138
Barriers	2	30	32
Local influence	21	5	26
Total responses	6,151	326	6,477

Question 26. Do you agree or disagree with the level of ambition proposed for the nutrient targets?

Table 52: Answers to question 26

Answer	Campaign	Non-campaign	All responses
Agree	97	301	398
Disagree	6,189	352	6,541
Don't know	0	164	164
Total	6,286	817	7,103

Question 27. (If disagree) What reasons can you provide for why government should consider a different level of ambition?

Table 53: Answers to question 27

Category	Campaign	Non-campaign	All responses
Lack of ambition	6,201	309	6,510
Delivery and regulation concerns	4,127	104	4,231

Category	Campaign	Non-campaign	All responses
Target definition and scope	855	136	991
Other	108	60	168
Barriers	37	30	67
Total responses	6,222	407	6,629

Question 28. Do you agree or disagree with the level of ambition proposed for a water demand target?

Table 54: Answers to question 28

Answer	Campaign	Non-campaign	All responses
Agree	152	347	499
Disagree	6,124	293	6,417
Don't know	0	184	184
Total	6,276	824	7,100

Question 29. (If disagree) What reasons can you provide for why government should consider a different level of ambition?

Table 55: Answers to question 29

Category	Campaign	Non-campaign	All responses
Lack of ambition	6,136	152	6,288
Delivery and regulation concerns	4,008	79	4,087
Other	1	202	203
Target definition and scope	13	108	121
Total responses	6,143	386	6529

Woodland cover

Question 30. Do you agree or disagree with the proposed metric for a tree and woodland cover target? (Agree, disagree or don't know)

Table 56: Answers to question 30

Answer	Campaign	Non-campaign	All responses
Agree	1	365	366
Disagree	2	309	311
Don't know	0	156	156
Total	3	830	833

Question 31. Do you agree or disagree that short rotation coppice and short rotation forestry plantations should be initially excluded from a woodland cover target?

Table 57: Answers to question 31

Answer	Campaign	Non-campaign	All responses
Agree	2	550	552
Disagree	0	87	87
Don't know	0	175	175
Total	2	812	814

Question 32. 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?

Table 58: Answers to question 32

Answer	Campaign	Non-campaign	All responses
Agree	3,797	625	4,422
Disagree	1	97	98
Don't Know	0	106	106
Total	3798	828	4,626

Question 33. Do you agree or disagree with our proposed level of ambition for a tree and woodland cover target?

Table 59: Answers to question 33

Answer	Campaign	Non-campaign	All responses
Agree	152	290	442
Disagree	6,142	430	6,572
Don't know	0	123	123
Total	6,294	843	7137

Question 34. (If disagree) What reasons can you provide for why the government should consider a different level of ambition?

Table 60: Answers to question 34

Category	Campaign	Non-campaign	All responses
Lack of ambition	6,164	409	6,573
Target definition and scope	3,943	156	4,099
Other	61	122	183
Barriers	19	98	117
Negative economic impacts	5	42	47
Interference with other Net Zero solutions	0	10	10
Total responses	6,165	529	6,694

Resource efficiency and waste reduction

Question 35. Do you agree or disagree with the proposed scope of the residual waste target being ‘all residual waste excluding major mineral wastes’?

Table 61: Answers to question 35

Answer	Campaign	Non-campaign	All responses
Agree	110	424	534
Disagree	66,245	263	66,508
Don't know	0	187	187
Total	66,355	874	67,229

Question 36. (If disagree) What reasons can you provide for why the government should consider a different target scope?

Table 62: Answers to question 36

Category	Campaign	Non-campaign	All responses
Lack of ambition	66,292	252	66,544
Concern over the export of recycling or waste	60,104	21	60,125
Other	50	108	158
Barriers	44	19	63
Environmental impacts	7	15	22
End-of-life treatment options	4	6	10
Includes too many sectors	0	2	2
Total responses	66,292	343	66,635

Question 37. Do you agree or disagree that our proposed method of measuring the target metric is appropriate?

Table: 63 Answers to question 37

Response	Campaign	Non-campaign	All responses
Agree	1	367	368
Disagree	0	182	182
Don't know	0	281	281
Total	1	830	831

Question 38. (If disagree) What reasons or potential unintended consequences can you provide or for see for why the government should consider a different method?

Table 64: Answers to question 38

Category	Campaign	Non-campaign	All responses
Other	0	98	98
Target definition and scope	3	83	86
Units of measurement	0	86	86
End-of-life treatment options	2	16	18
Data sources	0	13	13
Unintended consequences	0	11	11
Total responses	5	239	244

Question 39. 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?

Table 65: Answers to question 39

Answer	Campaign	Non-campaign	All responses
Agree	1	666	667
Disagree	0	26	26

Answer	Campaign	Non-campaign	All responses
Don't know	0	107	107
Total	1	799	800

Question 40. Do you agree or disagree with the level of ambition proposed for a waste reduction target?

Table 66: Answers to question 40

Response	Campaign	Non-campaign	All responses
Agree	59	356	415
Disagree	6,225	319	6,544
Don't know	0	196	196
Total	6,284	871	7,155

Question 41. (If disagree) What reasons can you provide for why the government should consider a different level of ambition?

Table 67: Answers to question 41

Category	Campaign	Non-campaign	All responses
Lack of ambition	6,243	307	6,550
Delivery and regulation concerns	4,082	94	4176
Other	1	163	164
Too ambitious	11	34	45
Unintended consequences	2	0	2
Total responses	6247	391	6,638

Question 42. Do you agree or disagree with our proposed metric for considering resource productivity?

Table 68: Answers to question 42

Answer	Campaign	Non-campaign	All responses
Agree	0	297	297
Disagree	11	160	171
Don't know	1	360	361
Total	12	817	829

Question 43. (If 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?

Table 69: Answers to question 43

Category	Campaign	Non-campaign	All responses
Other	0	152	152
Economic measure	1	46	47
Materials	0	41	41
Environmental measure	0	20	20
Sectors	0	8	8
Unintended consequences	0	6	6
Total responses	1	225	226

Question 44. 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.

Table 70: Answers to question 44 by policy type

Category	Total
Regulatory	201
Tax-price based	66
Other policy types	46
Information-based	39
Spend	22

Table 71: Answers to question 44 by sector-specific or product-specific measures

Category	Campaign	Non-campaign	All responses
Sector-specific	25	107	132
Product-specific	45	81	126

Table 72: Answers to question 44 by national and regional responses

Category	Campaign	Non-campaign	All responses
National	2	146	148
Regional	1	35	36

Air quality

Question 45. Do you agree or disagree with the level of ambition proposed for a PM2.5 concentration target?

Table 73: Answers to question 45

Answer	Campaign	Non-campaign	All responses
Agree	711	281	992
Disagree	11,291	457	11,748
Don't know	138	170	308
Total	12,140	908	13,048

Question 46. (If disagree) What reasons can you provide for why the government should consider a different level of ambition?

Table 74: Answers to question 46

Category	Campaign	Non-campaign	All responses
Lack of ambition	10,772	385	11,157
Delivery and regulation concerns	3,910	35	3,945
Target level not aligned with other environmental issues	1,435	176	1,611
Economic implications and impacts on sectors	1,526	68	1,594
Mentions emissions source	952	165	1,117
Other	450	116	566
Air quality disparities	76	15	91
Evidence	23	20	43
Too ambitious	5	2	7

Question 47. Do you agree or disagree with the level of ambition proposed for a population exposure reduction target?

Table 75: Answers to question 47

Answer	Campaign	Non-campaign	All responses
Agree	593	278	871
Disagree	11,379	383	11,762
Don't know	168	193	361
Total	12,140	854	12,994

Question 48. (If disagree) What reasons can you provide for why the government should consider a different level of ambition?

Table 76: Answers to question 48

Category	Campaign	Non-campaign	All responses
Lack of ambition	10,595	285	10,880
Delivery and regulation concerns	5,235	60	5,295
Mentions emissions source	1,657	72	1,729
Not aligned with other environmental issues	1,070	64	1,134
Other	541	164	705
Air quality disparities	201	13	214
Economic implications and impacts on sectors	169	16	185
Evidence	12	5	17
Too ambitious	9	1	10

Annex C: List of responding organisations

The list below includes the organisations that responded to the organisation, aside from those that requested their response be confidential. The list is not exhaustive but is based on those that declared their organisation and by reviewing the information provided by respondents. This may include responses from individuals who are members of specific organisations and therefore does not necessarily reflect that organisation's views. All responses received within the consultation deadline were counted in the response rates and their views included in the analysis.

- ADEPT
- Affinity Water
- Agricultural Industries Confederation
- AirNode
- Airscan trading as Iknaia Limited
- Aldersgate Group
- Alnwick Area Friends of the Earth
- Aluminium Packaging Recycling Organisation
- Alzheimer's Research UK
- AM Environmental Management Limited
- Amphibian & Reptile Conservation Trust
- Anglian Water
- Angling Trust
- Arcadis
- Archenfield Community Environment Group
- Archirodon
- Arqiva
- Artesia Consulting
- Association of Tree Officers
- Asthma + Lung UK
- Aviation Environment Federation
- Barratt Developments PLC
- Basingstoke and Deane Borough Council
- BASIS Registration Ltd
- Bat Conservation Trust (BCT)
- Bath and North East Somerset Council
- Bedfordshire Badger Group
- Biffa
- Bio-based and Biodegradable Industries Association (BBIA)
- Bioenergy Infrastructure Group
- Borough Council of King's Lynn and West Norfolk
- Brighton & Hove City Council
- British and Irish Association of Stroke Physicians

- British Association for Shooting and Conservation (BASC)
- British Ecological Society
- British Geological Survey
- British Heart Foundation
- Broadway Initiative, Aldersgate group, Greener UK, Wildlife and Countryside Link
- Brunel University London
- Brynley Andrews Associates
- Buglife - The Invertebrate Conservation Trust
- Building Engineering Services Association
- Bus Users UK
- Business in the Community
- Business Stream
- Cadent (Gas Distribution)
- CAGNE
- Cambridge City Council
- Cambridgeshire County Council
- Camden Council
- Canal & River Trust
- Canterbury City Council
- Canterbury College
- Cast Metals Federation
- CBI Minerals Group
- CCW
- CEMEX
- Central Bedfordshire Council
- Centre for Biodiversity and Environment Research, University College London
- Centre for Research in Sustainability, Royal Holloway, University of London
- ChangeKitchen CIC
- Charity Retail Association
- Chartered Institute of Ecology and Environmental Management (CIEEM)
- Chartered Institute of Environmental Health
- Chartered Institute of Wastes Management (CIWM)
- Cheshire East Council
- Chester Zoo
- Chiltern Society
- Chorleywood Parish Council
- City of Bradford MDC
- City of London Corporation
- CIWEM
- Clean Air Cambridge
- Clean Air Fund
- Clean Air in London
- Clean Rivers Trust

- Clean School Air
- CleanEarth4Kids.org
- ClientEarth
- Climate Action Berwick and Borders
- Climate Action St Austell
- Climate Friendly Bradford-on-Avon
- Communities Against Gatwick Noise and Emissions (CAGNE)
- Community Planning Alliance
- CONFOR
- Conscious Planet
- Cornwall Catchment Partnership
- Cornwall Seal Group Research Trust
- Cotswolds National Landscape
- Country Land and Business Association
- CPL Industries
- Crawley Borough Council
- Creature Comforts
- CropLife UK
- Cross River Partnership
- Crystal doors
- Cumbria County Council
- Cumbria Wildlife Trust
- Cycling UK
- Darlington Borough Council
- Dartmoor Commoners' Council
- Davidson and Robertson
- Department for Education
- Derbyshire Chief Regulators Group
- Devon and Severn Inshore Fisheries and Conservation Authority
- Devon County Council
- Devon Forestry Consultants
- Doncaster Council
- Dorset Council
- Dorset Local Nature Partnership
- Dwr Cymru Welsh Water
- Ealing Council
- East London Waste Authority
- Ecosurety
- Electronic Engineering
- Ella Roberta Foundation & BreatheLife global campaign
- Enebio Ltd
- Energy Saving Trust
- Environment Agency

- Environment Industries Commission - Natural Capital Task Force
- Environmental Investigation Agency
- Environmental Packaging Solutions
- Environmental Protection UK
- Environmental Protection: Cheshire West and Chester Council
- Environmental Services Association (ESA)
- Essex County Council
- Everflow Water
- Falmouth Civic Society
- Federation of Small Businesses
- Field Studies Council
- Folly Farmyard
- Food and Drink Federation
- Forestry Commission (FC)
- Freedom for Drivers Foundation
- Freshwater Habitats Trust
- Friends of Caldby Nature Park
- Friends of Carrington Moss, Save Greater Manchester Green Belts Group, Community Planning Alliance
- Friends of Hesketh Park and Mellor Green, Friends of Ladybrook Valley
- Friends of the Earth England, Wales and Northern Ireland
- Friends of the Freshney Valley
- Frith Resource Management Ltd
- G M Hibbs Associates
- Game and Wildlife Conservation Trust
- Global Action Plan
- Gloucestershire County Council
- Gosport Borough Council
- Grantham Institute - Climate Change and Environment at Imperial College London
- Gravesham Borough Council
- Greater Lincolnshire Nature Partnership
- Greater Manchester Combined Authority
- Greatfield Small Animals Rescue
- Green Alliance
- Green Angel Syndicate
- Green Southwell
- Greenpeace UK
- Guildford Borough Council
- Hambleton District Council
- Hampshire County Council
- Haringey Council
- Hart District Council
- Harwich Peninsula Friends of the Earth

- Havant Borough Council
- Havering Cyclists (part of the London Cycling Campaign)
- Hawk Conservancy Trust
- Herefordshire and Worcestershire Strategic Waste Partnership
- Hertfordshire and Bedfordshire and Neighbouring Authorities Air Quality Forum
- Hertfordshire County Council
- High Weald AONB
- Historic England
- HL Display (Harlow) Limited
- Hull and East Yorkshire LNP
- Humanist Climate Action
- Huntingdonshire District Council
- Imperial College London
- Independent Water Networks Limited
- Industry Council for Packaging and the Environment (INCPEN)
- Institute of Air Quality Management
- Institute of Environmental Management & Assessment (IEMA)
- Institute of Materials, Minerals and Mining (IOM3)
- Intergenerational Foundation
- Irwin Mitchell LLP - Planning and Environment Team
- Isha Foundation
- IUCN National Committee UK - Species Survival Working Group
- J4S Clothing
- Joe's Blooms
- Keep Ashton Green
- Keep Britain Tidy
- Kent County Council (response also endorsed by the Kent Nature Partnership)
- KORS - Keep Our Rural Spaces
- Lancashire Air Quality Group (air quality officers group from Lancashire local authorities)
- Lancaster City Council
- Land Promoters & Developers Federation
- Landscape Architecture, Masterplanning and Architecture
- LARAC
- Laudato Si' Group (Catholic green group)
- Launceston Anglers Association
- LB Hackney
- LB Redbridge
- Leeds City Council
- Leeds Clean Air Alliance
- Leicester City Council
- Leicestershire County Council
- Lincolnshire County Council

- Liverpool City Region Combined Authority
- Living Streets
- Living Streets (Islington)
- Local Authority
- Local Government Association London Borough of Lewisham
- London Borough of Newham
- London Borough of Waltham Forest
- London Councils
- London Living Streets
- Maersk
- Mair Perkins Ltd Animation and Illustration
- Major Energy Users' Council
- Mama Bamboo
- Mammal Society
- Marine Biological Association
- Marine Conservation Society
- Market Operator Services Ltd (MOSL)
- Marstrand-Taussig Transport Planning Services
- Mayor of London
- Mayors and Local Leaders - UK100
- Medway Council
- Merseyside Recycling and Waste Authority
- MESS (www.marplemess.org.uk)
- Mineral Products Association (MPA)
- Miss Eco and Friends of the Earth Lambeth
- Mitie Waste and Environmental Ltd
- Monksleigh Ltd
- MPI Limited
- MSC Naturally
- Mums for Lungs
- Muswell Hill & Hornsey Friends of the Earth
- National Association of Waste Disposal Officers (NAWDO)
- National Farmers' Union (NFU)
- National Federation of Fishermen's Organisations (NFFO)
- National Forest Company
- National Grid Gas plc
- National Highways
- National House Building Council (NHBC)
- National Parks England
- National Physical Laboratory
- National Pig Association
- National Sheep Association
- National Trust

- Natural England
- Nature Friendly Farming Network
- Network Rail
- New Energy Farms
- Newcastle City Council
- Nicholsons and Forest Canopy Foundation
- NicolaPeel.com
- Noarc21
- North Bristol Trust
- North East Lincolnshire Council
- North Herts District Council
- North London Waste Authority
- North Northamptonshire Council
- North Yorkshire County Council
- Nutrient Management Expert Group
- Nutri-San
- Best Beloved Animal Communication, Thames21
- Oase UK
- Office for Environmental Protection (OEP)
- Ofwat
- One Voice for Animals UK
- Ornamental Horticulture Roundtable Group
- Orsted
- Oxford City Council
- Oxfordshire Resources and Waste Partnership
- Parents For Future UK
- Pennon Group
- People's Trust for Endangered Species (PTES)
- Pesticide Action Network UK
- Pesticide Collaboration
- PGMBM
- Plantlife International
- Poems for Parliament
- Port of London Authority
- Public Protection Partnerships
- Putney Society
- RADE (Residents Against Dirty Energy)
- Ramblers' Association
- Reconomy
- Recycle NI
- Redbridge group of London Wildlife Trust
- Redbridge Mums for Lungs
- Redcar and Cleveland Borough Council

- REDS Group
- ReLondon
- Residents Association
- Residents' Group
- River Action
- Road Danger Reduction Forum
- Road Haulage Association
- Rotherham Council
- Royal Borough of Kingston upon Thames
- Royal College of Obstetricians and Gynaecologists
- Royal College of Paediatrics and Child Health
- Royal College of Physicians
- Royal Society for the Protection of Birds (RSPB)
- Royal Society of Chemistry
- Royal Town Planning Institute
- Rural Partners Ltd
- Rusland Reading Rooms
- Save Downlands Farm, Budletts Common, Uckfield TN22 2EA
- Save Our Woods
- Save Soil
- Save Surrey Countryside
- Savesoil movement
- Scottish Power
- Scrap Factory Farming (NGO - run by volunteers)
- Seal Research Trust
- Seas The Opportunity
- Seldon Medical Centre
- Severn Trent Water
- Sheffield Hallam University
- Sheffield Wildlife Trust
- SLDC
- Society of Motor Manufacturers and Traders (SMMT)
- Society for the Environment
- Soil Association
- Solid Fuel Association
- Solus Accident Repair Centres
- Somerset Local Nature Partnership
- South East Nature Partnership
- South East Water
- South Oxfordshire and the Vale of White Horse District Councils
- South Staffs Water & Cambridge Water
- South Tyne and Wear Waste Management Partnership
- Southampton City Council

- Southend-on-Sea BC
- Southern Water
- Southwest Environmental Limited
- Spelthorne Borough Council - Staines, Middlesex
- St Albans District Council
- St Thomas Crookes (Anglican/Baptist church) Sheffield
- Standard Gas Technologies Limited
- Stantec UK Ltd
- Stormwater Shepherds UK
- Stroke Association
- SUEZ Recycling and Recovery UK
- Suffolk County Council
- Surrey County Council
- Surrey Environment Partnership
- Sussex-air
- Sustainable Transport Alliance
- Swale BC
- Tallano
- Tarmac
- Team London Bridge
- Temple Group Ltd
- Thakeham Homes Ltd
- Thames Crossing Action Group
- Thames Water
- The Association for Renewable Energy and Clean Technology
- The Ecology Surveyor
- The Fourth Reserve Foundation
- The Institute of Chartered Foresters
- The Institution of Environmental Sciences
- The Intergenerational Foundation
- The Laurels at Inchbrook
- The Rainham Eco-hub
- The Rivers Trust
- The Stove Industry Alliance
- The Wildlife Trusts
- TransFIRe - University of Leeds
- Transition Bollington
- Trent Rivers Trust
- Trust for Oxfordshire's Environment
- Tustins Group Ltd
- UK Centre for Ecology & Hydrology
- UK Environmental Law Association
- UK Health Alliance on Climate Change

- UK Rainwater Management Association (UKRMA)
- UK Water Retailer Council
- UK Without Incineration Network
- UK100
- UKRI Interdisciplinary Circular Economy Centre for Mineral-based Construction Materials
- United Utilities
- University of Buckingham
- University of East London
- University of Hertfordshire, Hatfield, AL10 9AB
- University of Oxford
- University of York
- UWE Bristol
- Viridor
- Voice International
- Walking Pictures Ltd
- Walsall Metropolitan Borough Council
- Wandsworth Bridge Road Association
- Wanstead Climate Action
- Warrington Borough Council
- Water Regs UK
- Water Resources East
- Waterwise
- Wessex Water
- West Suffolk Council
- West Sussex County Council
- Westbury Town Council
- Western Riverside Waste Authority
- Westminster City Council
- Wienerberger
- Wildlife & Countryside Link (WCL)
- Wildlife Trust of South and West Wales
- Wiltshire Council
- Wirral Wildlife, the Wirral Group of Cheshire Wildlife Trust
- WM-Air
- Wood Panel Industries Federation (WPIF)
- Wood plc
- Woodford Greeners
- Woodland Forestry Ltd
- Woodland Trust
- Worshipful Company of Water Conservators of the City of London
- Wyeside Consulting Ltd
- Yorkshire Dales Rivers Trust

- Yorkshire Water
- Zero Carbon Mordens
- Zero Hour
- Zoological Society of London (ZSL)

Annex D: Campaigns and petitions

Campaigns

There were 6 campaigns that we identified based on the responses having content that was consistent. Each response within each campaign was counted as a separate contribution to the consultation. Some respondents submitted answers in more than one format (Citizen Space, email or through more than one campaign), these were counted as separate responses, but as single respondents.

Many of these campaign responses used standardised text and raised the same issues verbatim, but others had text that was amended or added by the individual respondent. All aspects of campaign responses were considered and included in the analysis, including when respondents had added to the suggested standardised campaign wording.

Asthma + Lung UK

There were 5,856 responses associated with this campaign, which responded to the air quality questions. These answers were assessed at question level. 12% of responses to questions 45 and 46, and 15% of responses to questions 47 and 48 were found to be standardised.

A majority of the responses were concerned that the target to reduce PM_{2.5} levels to a target of 10µg by 2040 isn't ambitious enough, and for the target to be achieved by 2030 instead of 2040 and for the WHO recommendation of 5µg to be reached by 2040.

Half the respondents called for a more ambitious target for the population exposure reduction target of 35%. Others wanted the target to be met earlier, were concerned that the target will fail to address pollution hotspots and wanted better data management.

Big Plastic Count

Led by Greenpeace and Everyday Plastic, The Big Plastic Count was an investigation into household plastic waste in the UK, aiming to find out how plastic is used in UK homes and what happens to it. There were 60,079 responses identified with this campaign: 58,990 were standardised and 1,089 individualised.

The main themes in the Big Plastic campaign response were around the resource and waste targets. Responses asked for much more ambition around the residual waste reduction target to almost eradicate single-use plastic in the next 15 years. Responses also called for a short-term target to reduce single-use plastic by 50% by 2025.

Friends of the Earth

There were 2,446 responses associated with this campaign: 58 were standardised and 2,388 individualised.

The main themes were seeking more ambitious targets for biodiversity on land and sea, water quality, air quality, and waste and resources – in particular targets for plastic pollution.

The standard response associated with the Friends of the Earth campaign covered all the targets and was incorporated into the analysis of all the targets. The responses included “Overall, I’m very disappointed in these proposals. They don’t go anywhere near far enough to secure the improvement our environment needs.” This was classified as disagreeing with all questions asking about the level of ambition of all targets, except when indicated otherwise, and the explanation was classified as a ‘lack of ambition.’

Greenpeace

All 47 responses identified with the Greenpeace campaign were individualised. The main themes were respondents seeking an increase in ambition across the targets for biodiversity on land and sea, water quality, waste & resources, and air quality.

For the waste targets, the majority had concerns around the export of waste, and the need for a separate plastic waste target.

Royal Society for the Protection of Birds (RSPB)

There were 4,343 responses identified with the RSPB campaign: 3,800 were standardised and 543 individualised. They responded to the biodiversity questions.

The main themes were for a more ambitious increase in species abundance to be measured against an earlier baseline and happen earlier. There were calls too for better management of protected sites, to improve their condition. Likewise, there were calls for higher ambition in the habitat target, with respondents asking for 750,000 hectares of high-quality and diverse habitat, rather than the targeted 500,000.

Responses associated with the RSPB campaign tended to include “We welcome last year’s Environment Act and the opportunity it provides to help nature recover. However, we are disappointed by the lack of ambition displayed in your current consultation on the targets it will introduce. We must be bolder if we are to help nature recover.” This was categorised as disagreeing with all Biodiversity questions asking about the level of ambition of all targets, except when stated otherwise, and the explanation was classified as a ‘lack of ambition.’

Respondents had concerns around the clarity, robustness and measurability of the species extinction target.

The Woodland Trust

There were 3,833 responses identified with this campaign: 3,559 were standardised and 274 individualised.

The main themes were that the woodland targets are not ambitious enough to mitigate the biodiversity and climate crisis and must help to reach net zero by 2050 and stop declines

in nature by 2030. Responses supported the inclusion of individual trees in countryside and urban areas. They also focussed on the need for the right trees in the right places, rather than just quantity of planting. This centred around the need for native, connected, wildlife-rich, future-proof woodland.

The standard response associated with the Woodland Trust campaign covered all the targets and was incorporated into the analysis of all the targets. It included “For nature and people to thrive, the whole suite of targets must be increased in ambition, scope, and measurability.” The statement was deemed to “disagree” with all questions asking about the level of ambition of all targets, except when stated otherwise, and the explanation was classified as a “lack of ambition.” The statement was also deemed to relate to “target definition and scope” and “delivery and regulatory concerns (regarding measurability)” for all questions where those categories were available.

Petitions

Two petitions were received that related to this consultation and were included as responses just like other (non-campaign) responses.

Friends of the Earth

Friends of the Earth presented an open letter with 42,324 signatories that challenged the targets under the Environment Act and requested more ambitious targets that will cut all types of plastic pollution, bring an end to non-essential single use plastics and provide healthy rivers and thriving nature. They also referenced 2 petitions as evidence to support their view:

- “Ask the government to prevent mass extinction” with over 200,000 signatories
- “A call for a new law to end plastic pollution” with 309,894 signatories

The Wildlife Trusts

The Wildlife Trusts presented a petition with 60,951 signatures that was referenced in their response to the consultation. The petition stated that the signatories “disagree with the government’s proposed targets for species abundance in England.”

The Wildlife Trust’s consultation response included some of the 10,000 comments, associated with the petition, on “why a different level of ambition should be considered.” Those comments in the consultation response were incorporated into the analysis of the 2030 and long-term species abundance target (questions 8 and 9).