

Environmental Principles Policy Statement

Make UK's submission to Defra: response to consultation

Introduction

Make UK is backing manufacturing - helping our sector to engineer a digital, global, and green future. From the first industrial revolution to the emergence of the fourth, the manufacturing sector has been the UK's economic engine and the world's workshop.

The 20,000 manufacturers we represent have created the new technologies of today and are designing the innovations of tomorrow. By investing in their people, they continue to compete on a global stage, providing the solutions to the world's biggest challenges. Together, manufacturing is changing, adapting and transforming to meet the future needs of the UK economy. A forward thinking, bold and versatile sector, manufacturers are engineering their own future.

The Manufacturing sector is typically subject to stringent environmental legislation and the Environmental Bill and related legislation are very relevant. Manufacturers' main concern at this stage is that new legislation does not create regulatory barriers to trade, and brings certainty so that they can confidently invest in their long-term future, as they re-evaluate their businesses in the light from the pandemic and the new post-Brexit conditions. The Environmental Principles Policy Statement will set the tone for future policy making on Environment, and it is therefore important that this statement is efficient, with a clear interpretation of the principles and how they will be applied, to provide confidence to English manufacturers in the system.

We welcome the present proposal for the Environmental Principles Policy Statement¹ which should allow for greater transparency and strengthened ability of the Government to protect, restore and improve the natural environment. Make UK is pleased to provide our general broadbrush views below. As a member of the Broadway Alliance, we also support and refer to the the IEMA (Institute of Institute of Environmental Management & Assessment)'s response to this consultation.

¹ [Draft Environmental Principles Policy Statement](#), Defra, 10 March 2021

Environmental Principles - An overview

The overview section of the draft policy statement introduces important aspects of the statement to policy-makers. It begins by listing the five environmental principles, included in the Environment Bill, whose application is covered in the later Process section. Following paragraphs explain the intended outcome of the draft statement and an explanation of how the draft statement will contribute to environmental protection and sustainable development, including the definition of important terms.

The final part of the section includes outline information on the application of the statement during policy-making, the duty, and the relevance of other documents.

Question 5. Do you think the overview section provides an adequate foundation for policy makers to apply the environmental principles in policy making?

The overview section provides a reasonable explanation of what is required. However, the ambition stated- to be the first generation to leave the environment in a better state than that in which we inherited it - is high, but not high enough. There should be a lot more emphasis on the need to make these principles the centre of government's concern, alongside climate change and net zero. It is crucial that policy makers truly understand the importance and urgency of not only preventing, remediating, and improving the natural environment, particularly in the light of the rising awareness of the evermore close inter-relation between the quality of the environment, biodiversity and climate change as well as pandemic.

Step 1: Understanding environmental impact better and its contributions to climate change

Question 6. Do you think step one allows policy makers to correctly assess the potential environmental effects of their policy?

Policy-makers are advised to consider whether a policy will have impacts on the environment including the extent to which it will contribute to climate change. However further detailed guidance should be referred to or developed to help them understand the potential contributions of environmental impacts to climate change. Overlooking such contributions would be very detrimental given the scale and urgency of the climate crisis. Similarly, the impacts on biodiversity and loss of habitat should be high up on the priority of policy makers' considerations.

Proportionality is required to be applied when assessing the environmental impact of a policy. Without case examples, it may be difficult to judge in a situation where there could be potential impacts on climate change, the biggest species-threatening challenge ever faced by humanity, or where the natural capital approach should be taken to estimate the economic impact.

Step 2: Understanding which principles are relevant- better interpretation and an opportunity to build on the current climate change and biodiversity ambitions

7. Do you think step one ensures that policy making will address the most important environmental effects?

The Environmental Principles proposal does not sufficiently highlight the need to not only prevent and repair, but to create net environmental gains. Since the Covid-19 pandemic, and the rising awareness of the impacts of climate change and loss of biodiversity, having better access to more and better natural areas have been recognised as essential to public welfare. The policy statement

should take the opportunity to build on this to be more ambitious, relating to COP15 and COP26, and emphasizing on natural capital.

Question 8. Will step two assist policy makers in selecting the appropriate environmental principles?

Emphasis on the overarching aspect of the Integration principle, which is key to applying the principles across government areas, is positive.

Without more guidance, however, on interpreting each of the principles and how they inter-relate, however, it will not always be easy for policy makers to decide which principles are key for their assessments. The OEP could provide this interpretation in a simple guide with practical examples.

Step 3: Applying the principles: better efficiency and consistency with other tools and instruments

10. Do you think the process for applying the policy statement (the three steps) provides a robust and sufficient framework for the application of the environmental principles as a whole?

The process for applying the principles is not very clearly outlined and would benefit from a visual diagram. The guidance should include how the policy statement should be used in conjunction with existing government assessment guidance (e.g. the Green Book) or the Environmental Approach to Natural Capital (ENCA).

The policy statement should also require taking into account the other relevant elements of the Environmental Bill such as the long-term environmental targets (including the 25-Year Environment Plan), and the Environmental Improvement Plans (EIPs). There should be a linkage between the principles the environmental targets and the four priority areas of the environment Bill (air quality, water, biodiversity and resource efficiency and waste reduction).

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