

Response ID ANON-JVC4-2Z7H-2

Submitted to **Consultation on the Draft Policy Statement on Environmental Principles**
Submitted on **2021-05-27 16:40:24**

Foreword

You and Your Organisation

1 Would you like your response to be confidential?

No

If you answered Yes to this question please give your reason:

2 What is your name?

What is your name?:

Marj Powner

3 Are you responding:

On behalf of an organisation

4 What type of organisation are you responding on behalf of? [Please note this question only applies if you are responding on behalf of an organisation]

Responding on behalf of another type of organisation

If responding on behalf of an organisation, please provide the name here. :

Friends of Carrington Moss

Background

Policy Statement on Environmental Principles

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

No

Please provide any additional information in support of your answer:

If this policy is to be meaningful, it must have much more rigour and anticipation of action than currently expressed in this introduction. There is much to be agreed with but, if we are to truly strengthen environmental protection and enhancement and implement genuinely sustainable development, there needs to be an expectation that Ministerial decisions will be actively reviewed and monitored to ensure these environmental principles are placed "at the heart of policy-making" and are not an "afterthought".

Weak wording, such as "proportionately applied" suggests that Ministers will be able to continue to justify the lack of action on environmental issues.

Process for Applying the Policy Statement

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

No

Please provide any additional information in support of your answer:

The environmental impact element is, again, not strong enough. Policy-makers should be directed to a high level risk-assessment which provides examples of policy changes and their potential impact (from not significant to severe) and, if the policy is implemented, the likelihood of that impact being experienced (from highly unlikely to highly likely).

This approach will support considerations of "proportionality". The document should move away from suggesting that a "lighter-touch" way may be appropriate. The "lighter-touch" way is the norm! What we need is genuine consideration of environmental issues in policy making.

In addition, policy-makers should be encouraged to engage with the public, and national bodies that represent them, at the earliest stages in policy-making. This would also help to ensure consideration of environmental issues are incorporated when perhaps they would previously have been over-looked.

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

No

Please provide any additional information in support of your answer:

See response to Q6

Step 2: Understanding Which Principles are Relevant

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

No

Please provide any additional information in support of your answer:

The prevention principle also needs to be considered to be relevant in all circumstances. All policy-making decisions should be expected to prevent, reduce or mitigate environmental harm. There possibly needs to be some examples of how severe the impact to environment can be from seemingly unconnected policies (carbon footprints, etc come to mind).

The policy should make it clearer that both the integration principle and the prevention principle should be applied to all new or existing policy regardless of Ministerial responsibilities.

There should be some emphasis on the risks of not recognising which principles are relevant to the policy and something about reviewing and monitoring policy changes. There should also be much more prominence on the value to policy-makers of identifying appropriate environmental principles.

Step 3: Applying The Principles

9 Do you think step three provide a robust and sufficient framework for the application of each individual environmental principle?

Q10 - Integration:

No

Q10 - Prevention:

No

Q10 - Rectification:

No

Q10 - Polluter pays:

No

Q10 - Precautionary:

No

Integration Principle - Please provide any additional information in support of your answer:

Could the guidance be more positive and provide examples of how it can be applied? Isn't the aim to enhance the environment as well as mitigate against harm? The document does not seem to give any weight to enhancement.

Prevention Principle - Please provide any additional information in support of your answer:

Some more detailed examples of how this principle can be applied would be useful.

Rectification Principle - Please provide any additional information in support of your answer:

Some more detailed examples of how this principle can be applied would be useful.

Polluter Pays - Please provide any additional information in support of your answer:

What happens to any funding received via the Polluter Pays principle – is it used for environmental initiatives?

Is this something that can be applied retrospectively – if new policies are introduced or existing policies are changed leaving existing businesses or individuals finding themselves identified as a contributor?

How will sustainable practices be measured and by whom?

If the end-user / consumer is deemed to be chargeable, how will communities/end-users/communities be involved in the decision?

How will policy conflicts be dealt with – eg air travel is highly polluting, yet it seems the Government subsidises it via (for example) fuel tax and VAT exemptions.

Could polluters be incentivised by rewards rather than just disincentivised by penalties?

Precautionary Principle - Please provide any additional information in support of your answer:

Could this principle also cover potential enhancements to the environment rather than just risks (where policy direction could, for example, actually lead to expected, but unquantified, environmental improvements – the risk here is not taking the policy decision which would allow such improvements to be made)?

That risk of not applying the principle could be very important and the result of not taking action or making a decision which leads to additional risks to the environment should be highlighted.

Innovation should incorporate nature-based solutions, which may drive greater benefits than new or innovative technologies (restoration of our peatlands springs to mind as one of these). The opportunity to deploy such solutions should also be mentioned in the Application of the principle.

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?

No

Please provide any additional information in support of your answer:

As mentioned above, policy-makers should be directed to a high level risk-assessment for each principle. This should provide some examples of policy changes and their potential impact (from not significant to severe) and, if the policy is implemented, the likelihood of that impact being experienced (from highly unlikely to highly likely).

This approach will support considerations of "proportionality". The document should move away from suggesting that a "lighter-touch" way may be appropriate.

The "lighter-touch" way is the norm! What we need is genuine consideration of environmental issues in policy making.

There should be room in the process for genuine engagement with communities and other bodies as this will bring real benefits in terms of additional ideas and opportunities.

Final Thoughts on the Policy Statement on Environmental Principles

11 Do you have any other comments on the draft policy statement which are not covered by the previous questions?

Yes

Please provide any additional information in support of your answer:

How will adherence to these principles be measured? There is nothing in this document that indicates the planned actions or expectations. The document does not give sufficient emphasis on the fact that Government policies can support environmental improvements/enhancements, not just reduce the impact of policies on the environment. In addition, the wording gives the impression that it is ok not to focus on environmental issues if there are other, more important, aspects to the policy (presumably, the economy). It is important that these principles are seen as non-negotiable, rather than a "nice to have if you can manage to squeeze them in"! The language is not strong enough to give that level of prominence. Furthermore, more weight should be given to the potential impact of not addressing environmental issues within policy-making. Finally, it is imperative that nature-based solutions are highlighted as an opportunity to both address environmental issues and give prestige to the potential for natural solutions to be the answer rather than potentially carbon-hungry technology solutions.

Consultee Feedback on the Online Survey

12 Overall, how satisfied are you with our online consultation tool?

Satisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it.:

It would be great to be able to flick back to the content whilst developing responses to the questions. Could there be a split screen option where both can be shown at the same time?