Public consultation response: Long-term environmental targets

To: Department for Environment, Food & Rural Affairs
By: The Intergenerational Foundation
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The Intergenerational Foundation (www.if.org.uk) is an independent think tank researching fairness between generations. IF's guiding principle is that policy should be fair to all – the old, the young and those to come.

Introduction
This document is an additional response to the Department for Environment, Food & Rural Affairs consultation on the setting of long-term environmental targets. The Intergenerational Foundation (IF) welcomes the opportunity to comment on the plans to set long-term environmental and ecological targets. The proposed targets address many of the key areas related to ecosystem health and environmental policy, but IF would like to raise the following points in addition to our online response.

Recognition of the importance of ecosystems
IF firmly believes that it is the responsibility of those currently alive to provide a clean and liveable environment to future generations. This commitment stems not just from the ethical perspective that the natural world has intrinsic value that future generations are entitled to enjoy, but that humanity is also vitally dependent on ecosystems to purify our water, maintain fertile soil and pollinate our crops. As such, IF wholeheartedly supports the strong, positive step that Defra is taking towards recognising the importance of ecosystems and biodiversity through the implementation of specific targets in priority areas. IF also recognises that achieving success in these areas will also help the UK deliver its other environmental pledges, such as the beneficial impact of planting new trees in improving the UK's capacity for natural carbon sequestration.

Long and short-term targets
The proposed 20-year targets certainly represent ambitious goals to improve the quality of the environment in the UK. Setting specific, legally binding long-term goals is, in theory, a good way to drive consistent environmental action by successive governments. However, IF believes that long-term goals need to be accompanied by specific short and medium-term targets and policies that are extensive and achievable, in combination with mechanisms to hold governments accountable if they do not deliver on the targets they set. As such, IF would like to see more detail regarding how regularly EIP reviews will be conducted and how often statistics regarding environmental targets will be published.

The introduction of legislation to ensure that the needs of future generations are assessed in all policy-making decisions could also be beneficial in meeting environmental targets. One such piece of legislation is the Wellbeing of Future Generations (2) Bill, currently under parliamentary debate, and which would enshrine the requirement for such considerations in UK law.

Neglected aspects

IF also believes that the proposed targets miss or inadequately address two key aspects of the UK's ecology; declining insect populations and declining quality of agricultural soil.

Insects are vital to ecosystems, both as prey for larger animals and for humans as agricultural pollinators. Many recent studies have found that insect populations are rapidly declining, with the rate of extinction for insects being 8x higher than for vertebrates. A 2017 study from Germany shows that insect populations have dropped there by ¾ over the past 27 years,[1] while a 2019 global review finds that over 40% of global insect species are threatened with extinction.[2] Butterflies, moths and bees, which all play key roles as pollinators in food systems, are under particular threat in the UK. Wild butterfly populations declined by 58% on farmed land between 2000 and 2009.[3] IF therefore believes that specific targets are needed to monitor and protect insect populations in the UK, on top of the broader biodiversity indictor.

Soil fertility is another key environmental issue that is not addressed in the consultation document. Intensive agriculture, especially deep ploughing, has caused a significant decline in organic carbon content of soil and degraded the quality of UK soil, threatening future crop yields. Intensive agriculture also makes heavy use of fertilizers, pesticides and herbicides, which contribute to insect population decline and nitrogen pollution in bodies of water. As such, IF would like to see more detailed policy on the regulation of intensive agriculture, which would have strong positive effects on several aspects of the UK's environment.

If you would like to learn more about the work of the Intergenerational Foundation or would like to organise a meeting to discuss the points we raise, please contact:

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[1] Caspar A. Hallmann et al., 'More than 75 Percent Decline over 27 Years in Total Flying Insect Biomass in Protected Areas', *PLOS ONE* 12, no. 10 (18 October 2017): e0185809, https://doi.org/10.1371/journal.pone.0185809.

[2] Francisco Sánchez-Bayo and Kris A. G. Wyckhuys, 'Worldwide Decline of the Entomofauna: A Review of Its Drivers', *Biological Conservation* 232 (1 April 2019): 8–27, https://doi.org/10.1016/j.biocon.2019.01.020.

[3] Andre S. Gilburn et al., 'Are Neonicotinoid Insecticides Driving Declines of Widespread Butterflies?', *PeerJ* 3 (24 November 2015): e1402, https://doi.org/10.7717/peerj.1402.