



Response submitted online

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Environmental Audit Committee
House of Commons
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Dear Environmental Audit Committee,

Please find below our Inquiry response on the 25-year Environment Plan.

INQUIRY: 25-YEAR ENVIRONMENT PLAN – FEBRUARY 2018

ENVIRONMENTAL ASSOCIATION FOR UNIVERSITIES AND COLLEGES (EAUC):

Response on behalf of our Members (United Kingdom and Ireland)

About the EAUC

Our passion is to create a world with sustainability at its heart. That's our vision. We exist to lead and empower the post-16 education sector to make sustainability 'just good business'.

The membership of the EAUC comprises higher and further educational institutions, with a combined budget of some £25 billion, responsible for educating over 2 million students supported by half a billion staff.

We have regional and country chapters, with member institutions connected deeply with business, industry, health and civic bodies at local levels, with reach internationally via their research, innovation and student mobility.

We believe

- That UK and Irish education should be a global leader in sustainability
- That educational institutions have a responsibility as anchors in their communities to be agents of change
- That education has a unique opportunity to transform lives and communities
- That education is at the heart of global sustainability
- That every student should have access to sustainability education
- That education should reflect best practice in operational sustainability
- In being flexible and adaptable to find solutions for a resilient future
- In the value of international collaboration

Our values

- Pioneering - driving sustainability through innovation
- Independence - our own unique voice
- Collaboration - together we go further
- Role Model - leading by example

- Empowering - supporting and inspiring our members

EAUC's Approach to the Inquiry

Post-16 education plays a crucial role in driving environmental changes – due to its privileged position in influencing the next generation, the geographical land mass that its institutions stretch across and the economic and social power that it wields. We have focused our response to the Inquiry on the need to tackle environmental issues at their source rather than temporarily stemming the symptoms – of which education is paramount. This is the only way to ensure long-term sustainable-growth that works for everyone.

Responses to Questions for Inquiry

Ambition and Reporting

- To what extent does the Plan set a sufficiently ambitious agenda across Government? How far do the objectives, targets and indicators set out in the plan reflect a higher level of ambition than existing targets (including European Union targets and the Sustainable Development Goals) and current performance? Are there any major gaps?

The Plan sets out a relatively ambitious agenda with many positives. However, it lacks any level of detail and tangibility which is what is needed to effectively ensure environmental behavioural change. There is limited discussion of the Sustainable Development Goals (SDGs) and no clear plan, which is a shame as this should be governing the whole Environmental Plan.

There is much talk about being sustainable, but recycling remains a focus, and this should not be the case because ultimately it is not sustainable to continue producing this amount of waste, whether it is 'recycled' or not. There remains many steps that should occur prior to recycling, i.e. limiting manufacturing of materials reliant on fossil fuels (plastics), reducing the purchasing of these materials through education (why they are so damaging) and legislation (banning products that are bad for the environment), and encouraging reuse. These should be the focus rather than recycling – that is a last port of call. In addition, very little is mentioned about fracking and its effects, and divestment from fossil fuels, which is disappointing.

While we support the attention given to primary schools and young people from diverse backgrounds, we consider this is insufficient to educate the next generation about sustainability. Education for Sustainable Development should be embedded in the curriculum at all levels, from primary schools right through to universities and colleges. Further consideration should also be given to upskilling those in work to foster through-life learning when it comes to the environment and sustainability.

The concept of a 'Year of Green Action' is welcomed – but we are only 10 months away from 2019 and no further details have been mentioned. This needs to be a collaborative effort and we welcome an opportunity to feed into this initiative – though we would encourage the Government to start looking at how to deliver this without delay.

We are concerned about a lack of commitment to environmental legislation. For real change, legislation is required. When we consulted our members on the topic of carbon emission reduction targets for the public sector – they [expressed a concern](#) that Government targets were not high enough and that legislation in the form of mandatory reporting was required to force change.

25-Year Environment Plan - written submission form from EAUC

- What would success or failure look like for the Plan? To what extent will the Government's proposals for reporting on the Plan allow for proper scrutiny of its performance against its objectives? Are the commitments to legislative action in the Plan sufficient to ensure it will endure beyond the current Parliament?

For this plan to be successful there needs to be meaningful metrics and an apparent cultural change in attitude and behaviour to improve sustainability. The plan is full of good intentions, but the proof will be in the metrics – there must be a depletion of negative impact and proof of net positive results. This is a chance to innovate on design, engineering, ecology, architecture, social benefits on a grand scale, providing cleaner air, cleaner soil and water.

Mandatory reporting on the SDGs would enable the production of these metrics. This should be a requirement for all public and private sector bodies, and the Environment Plan should be leading the way. In the meantime, the proposed mechanisms for reporting sound acceptable, though the phrase 'As far as we can, we will make the data collected available externally for others to use' is vague and a little concerning.

There is not enough proposed legislative action. It is mostly restricted to emissions and for the plan to be effective there needs to be farther reaching legislation. Longer timescale planning is welcomed as well as many of the actions ask for a result at the end of this period rather than indicators of progress.

Implementation

- The Plan sets out a natural capital-led approach and a principle of "environmental net gain" when undertaking development. What are the risks and benefits of adopting these approaches? What steps need to be taken during development and implementation to ensure they lead to positive environmental outcomes, especially in respect of biodiversity?

We believe that net gain and being net positive is the right approach to improving sustainability and environmental issues – but are wary that this may lead to overlooking or attempting to justify some of the more negative 'footprint' statistics. For this plan to be effective, the root cause of negative environmental statistics must be tackled, while at the same time improving the net gain. This will lead to an increase in baseline measurements and advance sustainability as a whole. Universities and colleges are rich sources of knowledge and the Government should consult with Further and Higher Education Institutions (FHEIs) for advice on environmental development, particularly within their local communities.

- To what extent does the Plan set out effective delivery mechanisms to ensure DEFRA, other Government departments and public bodies have the resources and responsibilities to implement it? Where should the Government seek agreement with the Devolved Institutions to ensure a common approach across the UK?

Many suggested actions in the plan aren't backed up by funding or resources, particularly with regard engagement, awareness and education. Again, there is a role for universities and colleges to play here. The Government also needs to incorporate a 'practice what you preach' element to the plan. There is little discussion on how the Government will improve its own environmental practices. The Environmental Audit Committee has already pointed out only two of 18 Government departments have incorporated the SDGs into departmental plans, and this beggars the question on how the remaining 16 departments can then request wide ranging environmental change from the general public.

Much of the plan is couched in terminology that is at best vague and at worst deliberately evasive. This therefore makes the delivery mechanism beyond reproach as the resulting metrics are so subjective. We would encourage clarity in terminology to ensure the delivery mechanisms can be evaluated objectively. For example, eliminating all 'avoidable' plastic is open to interpretation when it comes to what is and is not avoidable, resulting metrics might be unreasonably favourable – painting an inaccurate picture.

Principles and Oversight

- The Government has proposed an independent statutory body to “champion and uphold environmental standards as we leave the European Union”. What role, legal basis and powers will it need to ensure the Government fulfils its environmental obligations and responsibilities? How do these compare to the role of the European Institutions in the existing arrangements? What standard would it have to meet to be “world leading”?

An independent statutory body of this nature must have real teeth. Environmental legislation needs proper enforcement to bring about the change so urgently needed, particularly in light of the instability that Brexit will bring. The UK has accepted a key role in delivering sustainable development and this is going to require regulative and legislative input to ensure transformative change and allow us to proudly take a leading environmental position on the world stage.

A statutory body must also connect ecology with economics; recognising that our society and economic system survives within an ecological one. Following on from this, the body should have the power to ensure departmental spend within Government takes into account the 'triple bottom line' (social, environmental and financial).

Very clear targets are needed, at staged intervals, to match the science of climate change and the immediacy of the issues that we need to address. Government must be legally held to account for their actions, or lack of them, and to show enough funding is going into changing systems and the economic market.

- The Plan sets out a series of objectives and the Government says it will consult on a policy statement on environmental principles to underpin policy-making after leaving the European Union. What principles should the Government include as part of that consultation? What legislation might be needed?

Any principles underpinning policy must be fair and not disproportionately impact those less able to contribute. Awareness and education is key to ensuring public buy-in prior to the implementation of crucial policies such as 'polluter pays' and the 'precautionary principle', but ultimately regulation and legislation is needed to force those resistant to change.

The Environmental Plan cannot be a choice, it must be enforced or we stand no chance in the great battle with climate change and environmental ruin.

The EAUC is committed to ensuring sustainability is at the heart of Higher and Further Education and we would recommend the Government seek our advice in delivering the 25-year Environment Plan.

Yours sincerely,

A handwritten signature in black ink that reads 'Claire A Patton'.



25-Year Environment Plan - written submission form from EAUC

Iain Patton, CEO, EAUC