



Office for  
**Environmental  
Protection**

# Strategy and Enforcement Policy Consultation Report

November 2024



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## Summary

This report summarises the responses to our draft strategy and enforcement policy consultation, which ran from 18 July to 26 September 2024.

Fifty-seven people representing 44 organisations attended one of seven consultation events we ran during August and September 2024 in England and Northern Ireland. The consultation events provided opportunity for stakeholders to give feedback on key questions posed in the consultation. We also received 14 written responses to the questions we set out for consultation.

We are grateful to all those who responded to the consultation and contributed to the discussion sessions.

In general, the approach we proposed in the consultation was supported and participants and respondents agreed overall with the changes to our strategy that we proposed.

We received a range of feedback in relation to the strategy we set out for consultation. In this report we summarise this feedback and explain how it was taken into account in deciding the strategy we have published alongside this report.

## Introduction

The Office for Environmental Protection (the OEP) was established by the Environment Act 2021 to protect and improve the environment by holding government and other public authorities to account against their environmental responsibilities and the law.

In June 2022 we published our first strategy, which set out how we intended to deliver this mission. In Autumn 2023, we began a review of our strategy with the benefit of our first 18 months of operational experience. We decided to review our strategy after 18 months so we could consider and then seek views on whether the approaches we set out in 2022 were working as we intended and enabling us to make the most difference we can.

We remain a young organisation and are yet to use all of the powers provided to us in the Environment Act. Evidence of the effectiveness of our approach will take time and become more apparent the longer we operate. For these reasons, we reviewed certain areas of our strategy in greater depth, and others less so. We focussed on areas where we had received the most feedback during our first years of operation, where the context was not as we had expected, or where we judged there was the greatest opportunity for improvement.

We found that, overall, our 2022 strategy held true and remained an effective basis for us to operate. However, we identified some changes in specific areas and updated and simplified how our strategy was presented to make it easier for stakeholders and our staff to engage with and understand.

## About this report

This report is structured in two parts. In part one, we explain our approach to consultation, and who participated. In part two, we summarise the key feedback we received and explain how this has informed the strategy we have decided and published alongside this report.

## Part one: Our consultation approach

We published a draft strategy and enforcement policy for consultation on 18 July 2024.

The consultation ran for ten weeks from 18 July to 26 September 2024. We publicised it on our website and social media channels and through our usual stakeholder communication routes. It was open to all to respond.

During the consultation period, we gathered feedback through written consultation responses, and contributions to consultation discussion events we ran.

### Consultation events

We ran seven online events with stakeholders in England and Northern Ireland. The aim of the events was both to support participants to respond to the written consultation, and to gather views on specific areas through discussion during the events.

Stakeholders were invited from our established stakeholder records, based on those we had engaged with in the period since our establishment. We worked with membership organisations for business groups, local authorities, environmental lawyers and environmental non-governmental organisations to invite their members to participate, and so extend the reach of our engagement beyond those who have engaged with us to date through our work.

The agenda of discussion groups was aligned with the questions set out in the written consultation. Attendees were directed to the draft strategy and consultation questions in advance, made aware that notes of the discussion were being taken and that this would form part of the evidence gathered of stakeholders' views for the purposes of the consultation. Meetings were recorded to support the accurate capture of views expressed.

The events were attended by 57 people in total, representing 44 organisations.

Attendee category	Number of organisations attending	Percentage of attendees
Academic or research institution	2	5%
Business	4	9%
Environmental non-governmental organisation	16	36%
Representative or membership body	14	32%
Statutory agency or local authority	8	18%
<b>Total</b>	<b>44</b>	<b>100%</b>

**Table 1.** The number of attendees at consultation events by category.

## Written consultation

We provided a downloadable response form alongside our draft strategy and enforcement policy. The form provided background to the changes we proposed and asked 13 questions relating to the key areas of change from the strategy we set out in 2022, and areas where we had received the most feedback in our two years of operation.

We invited stakeholder organisations and the public to respond to the draft strategy either by completing the form, or by providing more general feedback via email or post.

We received 14 responses. Eleven organisations who responded also attended a consultation event, one did not.

Respondent category	Number of responses	Percentage of responses
Environmental non-governmental organisation	5	36%
Individual	2	14%
Representative or membership body	2	14%
Statutory agency or local authority	3	21%

Other	2	14%
<b>Total</b>	14	100%

**Table 1.** The number of written responses received by category.

Nine (69%) respondents chose to complete the downloadable form, or respond directly to the questions posed. Five respondents chose to provide feedback in writing in other ways.

Annex A provides a list of organisations who participated in the consultation events or provided a written response.

## Satisfaction with the consultation process

Those respondents who completed the downloadable form were asked to rate their satisfaction with the consultation process. This question received seven responses. All those who responded were satisfied or very satisfied with the consultation process.

We collated feedback informally from the consultation events. Attendees reported that they valued the opportunity to ask questions relating to the strategy, and to understand more about the changes we proposed to make. Some noted that the events had provided a valuable opportunity to provide feedback, instead of a written response. In some sessions, attendees were less familiar with our role and work, which provided opportunity to explain more about our role, strategy and approach.

## Approach to analysis of responses

All consultation responses were read and considered in full by a number of OEP staff, drawn from across our teams and professional disciplines. A summary report of the key feedback from the consultation events was prepared, and considered by these staff alongside the consultation responses. Those staff quality assured this report as a fair and representative summary of the responses received, and discussions held.

This report summarises the feedback received. This report was considered by our executive committee and board in reaching decisions about our final strategy and enforcement policy.

## Part 2. Feedback received

The key themes that emerged from the feedback are summarised below, structured around the questions asked in the consultation. Feedback from discussion groups has been integrated alongside written responses.

Extracts from consultation responses and discussions held are included to illustrate the summary provided. These were chosen to be representative of the key themes of feedback provided.

## **2.1 Section 2 of our strategy: Our objectives and how we aim to achieve them**

We asked for feedback in relation to this section of our strategy overall, and specifically in relation to the description of success we set out. We received a range of written feedback and this topic featured prominently in each of our discussion groups.

In discussion groups, a number of participants welcomed the increased clarity of how we aim to secure our objectives provided by the descriptions of success. Participants recognised it as a 'theory of change' or 'logic model', and judged this helpful to enable others to understand the OEP and hold us accountable for our success. Some participants commented that the narrative was strong, and gave the strategy a good sense of purpose. Consultation respondents were similarly welcoming of the descriptions set out.

A small number of specific suggestions for additional statements of success were proposed through written responses or in the discussion groups. Some of these relate to topics raised elsewhere in responses, and therefore this report. For example, one respondent suggested a specific condition of success ought to be to increase public engagement with the OEP; a second suggested that a condition of success ought to be to improve the design of the statutory environmental targets.

Other suggestions made were more specific, for example relating to specific areas of the environmental improvement plans or domains of the environment. For example, conditions of success relating to biodiversity, plants, and the availability of ecological expertise to decision makers were proposed.

Several respondents suggested changes to the statement "When we speak, those we are speaking to hear and understand what we say" to include that they should also act on what we say.

More generally, some respondents provided feedback on our objectives and, in a small number of cases, specific aspects of the approach we proposed. For example, suggestions included giving greater prominence to the role of stakeholders and our board members in our objective for organisational excellence and influence.



In responses to this section, some respondents chose to provide feedback on the strategy overall. Feedback provided was positive, with several commending the strategy and the work of the OEP to date.

“We recognise the critical role the OEP has to play in steering, upscaling and setting the pace for nature’s recovery, and we highly commend the transparent, professional and strategic approach taken at this crucial time.” Plantlife

“We appreciate the increased transparency set out by the OEP on what success looks like and how it intends to measure its success.” National Farmers Union

“The four strategic objectives described in the draft strategy are consistent with the mission of the OEP. The success criteria described for each of the objectives are clear.” Wessex Water

## **OEP response**

Our objectives and the conditions of success were welcomed. We have made changes to the conditions of success to make clear that success relies on others acting on what we say, as well as hearing it, as suggested.

We did not make changes to the draft conditions of success in response to other suggestions. In a number of cases, suggestions were at a level of specificity that we judge to be not appropriate for our strategy given our role to scrutinise environmental progress and law broadly. We also did not make changes to incorporate statements of success relating to the design of environmental targets, and public engagement with the OEP for the reasons set out elsewhere in this report in response to feedback in relation to these issues. These matters are discussed further in sections 2.4 and 2.6 of this report.

We made some changes to incorporate detailed suggestions raised in relation to our work to achieve some of our objectives.

## **2.2 Section 3.3 of our strategy: Our issue-based approach**

We asked for feedback in relation to the issue-based approach set out in the draft strategy.

Overall, respondents and participants welcomed our issue-based approach in principle, and welcomed that it is set out in our strategy. They identified it as helpful to understanding of the OEP and judged that it improved transparency about how and why we make our decisions. This was particularly emphasised by public bodies we oversee.

Several respondents highlighted the importance of gathering information and evidence held by others for an issue-based approach to be effective. In particular, stakeholder engagement was highlighted by a number of respondents as a key source of valuable information which they asked to be given due prominence. These sentiments were echoed by participants in the discussion groups.

A number of comments drew links between our issue-based approach, and the approach we set out to prioritisation in section 3.4. A small number of respondents expressed concern that the approach described may lead the OEP not to prioritise issues where evidence is weaker, or the issue poorly understood. A similar small number of respondents suggested that it could lead us to be insufficiently timely and urgent in our responses, as a result of the pursuit of ever more evidence. One respondent expressed concern that the OEP may focus on issues more appropriate for other regulators.

Some felt that public understanding of our issue-based approach would be improved if it were described more simply, and suggested case studies or examples to illustrate it may be helpful.

“With a wide remit and relatively modest resource it is important that OEP is both rigorous and transparent in how it prioritises. The use of an issue-based approach is a sensible approach to achieving this.” Wessex Water

“We support the emphasis on effective two-way dialogue and the importance of gathering valuable expertise and insights into the issues on the ground.” Environment Agency

“The OEP’s issue-based (3.3) and prioritisation (3.4) approach is laid out to be the most impactful method for key issues, and we believe could be especially important for vital but underrepresented issues. However, it does carry the risk of major issues being side-lined or delayed due to significant gaps in evidence.” Plantlife

## **OEP response**

In general, respondents and participants welcomed the approach we set out, and viewed it as an effective approach for the OEP given the breadth of our remit and scale of our resources.

In light of feedback, we have clarified how our issue-based approach relates to other areas of our strategy. In particular, we have strengthened links between how we work with others (set out in section 3.7), and how we prioritise (section 3.4) and the issue-based approach we set out in section 3.3. We have sought to simplify the description of our issue-based approach, in light of feedback.

Some of the feedback provided was most relevant to how we describe our approach to prioritisation, and so we made some clarifications to this section in addition. In particular, we have made clearer how we take into account the timeliness of our interventions in our prioritisation choices.

## **2.4 Section 3.5 of our strategy: Our values**

Our values received broad support in the consultation responses. The values were considered appropriate for the OEP, with respondents particularly highlighting the importance of our values ‘we are evidence-led’ and ‘we are independent’.

While the consultation did not directly ask for feedback on whether we are applying our values in practice, some respondents highlighted that they recognised the values described in their engagement with us and our work.

Some respondents raised the requirements of the Environment Act 2021 that we act impartially and objectively and have regard to the need to act proportionately and transparently. Several noted that these requirements underpin and are explicit in how we describe the values we set out. One encouraged that proportionality be given more prominence, and in particular that we set out how social and economic factors are taken into account in our work.

One respondent sought greater clarity on the alignment between our values and other expectations on public servants, such as the seven principles of public life.

“We strongly support the OEP’s values which are what we would expect and which we recognise from our interactions with it.” Green Alliance

“We like your values (particularly that you are evidence-led)” Community Planning Alliance

“The values are consistent with the requirements of the Environment Act 2021. While not explicit in the 4 values (independent, purposeful, evidence-led, act with integrity), the importance of acting proportionately and transparently is explicit in the text describing the values.” Wessex Water

## **OEP response**

In general, respondents welcomed and supported the values we set out. We made some changes to our value ‘we are independent’ for clarity in light of feedback received.

We considered whether we should make changes to our value ‘we are purposeful’, and in particular in explaining further how we have regard to the need to be proportionate. We decided not to make further changes, judging that it effectively describes how we aim to be proportionate in our work so that our action is in proper balance with its consequences.

Our codes of conduct for our board members and our staff make clear the expectation to comply with the seven principles of public life. We have made this clear in our strategy.

## **2.5 Section 3 of our strategy: Our overall approach to deliver our mission and objectives**

We asked for feedback on our overall approach to delivering our mission and objectives. In this section, respondents largely chose to provide feedback in respect of section 3.6 (How we work across Northern Ireland and England) and section 3.7 (How we work with others) of our strategy. These are summarised with reference to the headings of our strategy in these sections.

## Our approach to engagement with our stakeholders

Our overall approach to engaging with stakeholders was welcomed and commended, notably during the discussion groups. In general, stakeholders expressed confidence in our approach to engagement and transparency.

Several respondents suggested our strategy ought to give greater prominence to communication with the public or local communities as key stakeholders in our work. Some noted the importance of this in relation to improving the transparency or public awareness of our work. Others suggested it was important in mobilising action for environmental improvement, or in ensuring that we have a proper understanding of issues on the ground. One suggested this was particularly important in Northern Ireland.

## How we work with other public authorities

Some public authorities highlighted the behaviours that make it straightforward for them to co-operate with us, as our strategy sets out that we intend. Advanced notice and clarity of requests were noted as most important. Other respondents queried whether our strategy should explain how we will review how effectively co-operation is being provided by others, as the law intends.

Participants suggested we should explain more clearly our relations with other bodies such as Environmental Standards Scotland and the Interim Environmental Protection Assessor for Wales, as well as the institutions of the European Union where this is appropriate.

## How we work across England and Northern Ireland

Some respondents noted the adoption of an Environmental Improvement Plan for Northern Ireland during the consultation period, and the need for the draft strategy to be updated in this regard.

Participants in discussion groups, and a small number of consultation respondents, highlighted the importance of transboundary issues between Northern Ireland and the Republic of Ireland and sought additional clarity on how such issues would be managed. A small number of respondents sought additional operational information on how we work across England and Northern Ireland, in the way the strategy sets out that we intend.

“The OEP’s clear and open approach to engagement with stakeholders, with the intention to ‘understand the priorities, evidence and different perspectives others have’ is welcome.” National Farmers Union

“We would like to see more reference to engagement with the public as key stakeholders” Community Planning Alliance

“Setting an objective to working with bodies in Ireland to assess, monitor and enforce legislation in transboundary areas would cement the need for establishing working relationships with bodies in Ireland” Anonymous

## **OEP response**

Feedback provided reflected positively on our approach to stakeholder engagement overall.

We had carefully considered the role of the public as a key audience for our work in developing our strategy for consultation. We aim to be transparent, and for our work to be accessible to the public through our website, social media, and through the media and our engagement with others. We aim for our complaints and enquiries function to be an accessible and simple way for the public to engage with us. However, we do not judge that we should prioritise a high public profile as an outcome of our strategy, and instead concentrate on continuously improving those areas where we interact most directly with the public. We have made some changes to the strategy to reflect these priorities of accessibility and transparency.

We have clarified how we work to ensure that each of our projects benefits from the right combination of technical skills and local expertise, to illustrate how we make all our capabilities available for our work in each of England and Northern Ireland. We have also explained more why we consider cross-border issues in relation to our work, in the way our strategy sets out.

We have added further detail to explain how we aim to work with public authorities so that it is straightforward for them to co-operate with us, and strengthened the description of the collaboration we seek with other public authorities like Environmental Standards Scotland, or the Climate Change Committee.

## **2.6 Section 4.2 of our strategy and our enforcement policy**

We sought feedback in respect of our enforcement policy and the overall approach to enforcement described in our strategy. Respondents to this section of our consultation gave feedback on both this, and our approach to managing complaints. This was similarly true in discussion forums.

Respondents considered our strategy and enforcement policy to clearly explain our approach to enforcement. Similarly, respondents judged it to be clear from our strategy that we use a wide range of information to inform our enforcement work, and that complaints received can inform work through all our functions.

Participants in discussion forums suggested we could better explain what complainants can expect when submitting a complaint to us. Suggestions included setting out how long stages of our process may take, providing more information about how we have judged what is serious in prior decisions, or providing further information to complainants where we do not immediately progress enforcement activity, but other action is taken at a later date. Some expressed concern that the requirement for a complainant to have exhausted a public authority's complaints process (required by the Environment Act) may prove a barrier to accessing our complaints service.

Some consultation respondents suggested that we are slow to progress matters through complaint handling and during investigations and expressed concern that we are yet to use all of the enforcement tools provided to us in the Environment Act. There was, however, universal agreement to our intended approach both to seek resolution as early as possible, and without recourse to formal processes wherever this is possible.

There was broad support to providing additional information on our approach to interventions in judicial review brought by others.

“We regret that some aspects of the enforcement system have not yet been fully utilised, particularly environmental review which has meant that some investigations are taking far too long to progress.” Wildlife and Countryside Link

“agrees that where possible, informal resolution of matters with the public body should be sought before recourse to formal enforcement action. This is likely to be the quickest and most cost-effective route for resolving issues in many cases.” National Farmers Union

## **OEP response**

Overall, there was support for the approach to complaints and enforcement set out in our strategy and enforcement policy. In particular, there was continued support for our approach to resolve issues as early as we can, and to resolve issues through dialogue and cooperation where this is possible.

We aim to be as transparent as we reasonably can. We have amended our strategy to make clearer that we aim to continually improve our complaints procedures over time, including through the information we make available to complainants before and after a complaint. The consultation has provided helpful examples of some areas where this may be possible.

Our enforcement policy sets out in detail those factors we take into account when deciding what is and is not serious. We do not think that additional information could be provided in this respect without creating risk to the integrity of our decision-making processes and have therefore not amended this element of strategy and enforcement policy.

Similarly, our strategy and enforcement policy each make clear that we are ready to turn to our enforcement powers to remedy serious failures in compliance with environmental law when this is needed. But also that it is our intention to resolve compliance issues as early as possible and without such action wherever this is possible. We have made some changes to aim to be clearer as to how these different aspects interrelate.



## 2.7 Section 4.3 of our strategy: How we assess and report on government's progress in meeting environmental goals and targets

We sought feedback on our approach to assess and report on progress in meeting environmental goals and targets, and specifically on our intended approach to analyse both past trends, and the prospects of meeting future goals and targets.

There was consistent support for our intended approach to analyse the prospects of meeting future goals and targets. This was particularly noticeable throughout the discussion forums, where stakeholders noted it as important to improving the likelihood of goals and targets being achieved. No contrary views were expressed, although some participants questioned the extent to which the OEP could fulfil this role well within the resources available.

Some consultation respondents and participants in discussion forums questioned the prospects of us meeting our objective for sustained environmental improvement with the current goals set out in the Environmental Improvement Plans and statutory targets. Respondents encouraged us to take a more active role in scrutinising the design of goals and targets, as well as progress towards them, and that this should be reflected more clearly in the strategy.

Respondents also sought greater emphasis in the strategy on our role to highlight gaps in evidence and data to support environmental improvement. One respondent noted this as particularly important in the context of transboundary and cross-border issues.

Some participants noted the relationship between our scrutiny of progress, and the progress reports prepared by government, and the potential to improve the sequence and consistency of approach to these to support public understanding.

“In addition to focusing on a specific reporting year, the emphasis given to assessing the prospects of achieving goals and targets by analysing potential future trajectories of environmental improvements is particularly welcomed.” Natural England

“We suggest that scrutiny of the environmental targets set by government – rather than simply scrutiny of progress against these targets - should feature more prominently within the OEP's objectives.” Freshwater Habitats Trust

“Due to the fact that the scope of the OEP's work is so wide-ranging and draws on most sources of data available, the OEP is in a strong position to be able to highlight significant and recurring holes in the environmental information we have.” The Rivers Trust

“While the OEP's processes and reports must of course remain wholly independent of the government's, a more consistent format would help external stakeholders, including parliamentarians and Assembly members, better understand where progress is on track and where there are failures or gaps.” Green Alliance

## OEP response

Our intention to increase focus on scrutiny of the prospects of goals and targets being achieved was strongly endorsed through the consultation. We have made no changes in this regard.

Our strategy explains our role to scrutinise progress against the goals and targets government, Parliament and the Assembly decide. There are circumstances where we may decide to scrutinise the design of goals and targets, in line with our statutory role. For example, where a change in the environmental laws which set statutory targets is proposed, we may advise on changes. Where inconsistencies or incoherence between goals and targets may act as a barrier to effective implementation of the law, or the prospects of those targets being achieved, we may report on this through our scrutiny of environmental progress or environmental law. We have clarified these circumstances in our strategy.

We have also sought to strengthen how we describe our role in identifying and encouraging others to fill gaps in evidence or data which supports environmental progress.

## 2.8 Section 4 of our strategy: our approach to exercising our key statutory functions

We sought feedback on our approach to exercising our key statutory functions in general.

Responses to this section of our consultation were considered alongside other consultation questions where they were closely related to the statutory functions considered by those questions and are treated similarly in this report.

We received a small amount of further feedback in relation to section 4.4 (Scrutinising environmental law) and 4.5 (Advice).

Across these functions, one respondent considered the strategy should emphasise more the importance of understanding the context in which the law is applied in reaching our judgments and recommendations. A second considered there to be scope for greater flexibility in the scale of our scrutiny of environmental law, to allow greater flexibility and responsiveness.

“The depth of these assessments is admirable but does limit how many laws can be assessed. We encourage the OEP to consider whether a slight rebalancing would be beneficial so that more reviews can be undertaken.” Green Alliance

## OEP response

We have amended the strategy to explain our intention to vary the scale and depth of our scrutiny of environmental law, depending on the issues involved and the time at which our findings need to be available to those to whom they aim to inform.



We have not made any further changes to describe how we aim to understand the context in which law is applied when making our recommendations, which is addressed in the approach we describe to each of these functions.

## **2.9 Section 5 of our strategy: our approach to measuring success**

We received less feedback in relation to this element of our strategy through the consultation responses, and in the discussions held.

The feedback received welcomed the intent of our approach, and recognised the challenges in measuring success for an organisation like the OEP. This was a particular feature of several of the discussion groups. Some respondents encouraged us to continue to work towards more measurable indicators of success over time.

We received no feedback on any of the specific indicators identified. But received a small number of specific suggestions for additional data which might add to some elements of the approach outlined.

“We strongly commend the OEP’s ambition to adaptively monitor and improve its own performance.” Plantlife

“acknowledges that given the complexities of the environment and the strategic priorities that the OEP has set, it will be difficult in many cases to provide quantifiable or directly tangible evidence that the OEP’s activities have been successful. To the extent practicable, it would be helpful for the OEP to report progress towards or success against its strategic priorities in a clear, easy to understand manner to facilitate greater awareness and understanding by wider stakeholders of the OEP’s effectiveness.” UK Environmental Law Association

### **OEP response**

The principles of the overall approach we set out were welcomed by those who responded to this element of our consultation. We considered the specific suggested data sources but made no specific changes in light of the feedback provided. We will continue to seek to improve our approach over time, in the ways set out.

## **2.10 Satisfaction with the strategy and enforcement policy overall**

Respondents to the consultation were asked to rate how satisfied they were that the draft strategy and enforcement policy provide a good foundation for us to fulfil our remit. Seven respondents chose to answer this question, five were satisfied, one very satisfied and one was neither satisfied or dissatisfied.

# Annex A – Organisational participants

The organisations that participated in the consultation, either through a written response (marked with an \*) or by attending a discussion event.

## Academia or research institute

Queens University Belfast  
UK Centre for Ecology and Hydrology

## Business or business group

Aldersgate Group  
Cleaver Fulton Rankin  
Dunelm  
Wessex Water\*

## Environmental non-governmental organisation

Butterfly Conservation Northern Ireland  
Fish Legal  
Freshwater Habitats Trust\*  
Green Alliance\*  
Keep Northern Ireland Beautiful  
Anonymous  
National Trust  
Northern Ireland Environment Link  
Plantlife\*  
Rivers Trust\*  
Royal Society for the Protection of Birds  
Anonymous  
Ulster Wildlife  
Wildlife and Countryside Link\*  
Wildlife Trusts  
Anonymous

## Representative or membership body

Angling Trust  
Association of Directors of Environment, Economy, Planning and Transport  
Chartered Institute of Ecology and Environmental Management  
Community Planning Alliance\*  
Institute for European Environmental Policy  
Institution of Environmental Sciences  
Local Government Association  
Lough Neagh Partnership  
National Farmers Union\*  
Nature Friendly Farming Network  
Royal Society of Ulster Architects  
Royal Town Planning Institute  
UK Environmental Law Association\*

Ulster Angling Federation  
Ulster Farmers Union

**Statutory agency or local authority**

Agri-food and Biosciences Institute  
Cumberland Council  
Drainage Council Northern Ireland  
Environment Agency\*  
Joint Nature Conservation Committee  
Loughs Agency\*  
Natural England\*  
Ofwat