



Sussex
Wildlife Trust

Storrington & Arun Valley Regional Group

C/O Woods Mill
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November 17th 2022

To Whom it may Concern

The Retained EU Law (Revocation and Reform) Bill – Objection with Evidence

I am writing on behalf of the Sussex Wildlife Trust's (SWT) Storrington & Arun Valley Regional Group to object most strongly to the intention to revoke and reform around 570 EU environmental protection laws which are part of this Bill. Although we have no legal expertise, we write as a community group with over 200 registered members. We further the aims of the SWT at a local level around the Arun Valley in rural West Sussex. The passage of this Bill through Parliament (both in respect of its Revocation as well as Reform) gives us reason for grave concern. This is a critical time in human history when nature should be central to all legislation and policy, and the ability for Parliament to debate and scrutinise these aspects are vital.

These EU laws have progressively evolved and strengthened with strong UK input over decades to establish an invaluable basis and framework to protect our environment. They are founded on important key principles, notably precaution, prevention, rectifying pollution at source, and 'the polluter must pay'. These principles must not be lost or weakened in any way. Currently there is no Government plan to roll out new environmental legislation before these laws are automatically ended ('sunsetting') by 31st December 2023. The scale of this legislative review is enormous, and the timetable short. If this Bill were passed, the Environment Act of 2021 will be virtually toothless!

Some of the key specific laws at stake include:

- The Conservation of Habitats and Species Regulations 2017: rules that protect hundreds of wildlife sites from unsustainable development and safeguard threatened species from destruction.
- The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017: the laws that set strict standards for rivers and streams, guarding against pollution and over-abstraction.
- The Air Quality Standards Regulations 2010: imposing limits on toxic air pollution, such as particulate matter, which is responsible for widespread environmental harm and serious harm to human health.
- The Marine Strategy Regulations 2010: requiring government to implement plans for the protection of our seas and vulnerable sea life.

Our members feel proud and privileged to live in West Sussex which has many valuable sites for nature. We are determined to do what we can to protect them as an organisation and individually as voting members of the public. Internationally protected species are under threat, along with sites such as the Arun Valley Ramsar site, Special Area of Conservation and Special Protection Area. Without retained EU law, these protections are all at risk of being degraded.

In West Sussex, we have unfortunately experienced regular incidents of sewage dumping, routine pollution of our rivers and streams through agricultural run-off and steady deterioration of water quality. We need this to be reversed, not made worse through loss of legal redress.

EU laws have provided valuable protection in the past and what is needed now is for these to be retained, improved and enforced. An approach which revokes existing protection before effective equivalent or better legal replacements are in place is unacceptable and would be a massive backwards step. This would leave key aspects of wildlife protection deregulated and unprotected, which goes directly against the post-Brexit promise of the government to halt the decline of nature by 2030.

Furthermore, this Bill intends to automatically repeal the REUL by the end of 2023 unless Ministers decide to maintain it before that date. The Bill gives the UK and devolved governments wide powers to determine the future of each piece of retained EU law without the necessary Parliamentary review and scrutiny. Cutting 'red tape' through premature, wholesale and a poorly thought through, headline-grabbing bill is not what the public expect from our government.

As a group, we firmly believe that the current Bill to revoke and reform key environmental laws without replacements legally in place, is likely to create a free-for-all, leading to damaging practices to the environment and will undo years of progress. It is a dangerous and superficial process.

We implore you not to pass this Bill and to find other solutions and plan for a far better way forward.

Yours faithfully

Mr P D Huggins

Group Secretary

Sussex Wildlife Trust Storrington & Arun Valley Regional Members Group