

How the Environmental Improvement Plan will deliver the targets of the Environment Act 2021

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Legislation and
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Introduction

On 1 December 2025, the government published its revised [Environmental Improvement Plan \(EIP25\)](#). This had been eagerly awaited since July 2024, when the government [launched](#) a ‘rapid review’ of the [previous government’s EIP23](#), promising to publish delivery plans for the legally binding targets in the Environment Act 2021 which the Office for Environmental Protection (OEP) and environmental organisations had said were needed to meet the targets. The OEP has [repeatedly found](#) that government progress on protecting and improving the environment is largely off track, and that the window of opportunity to turn this around is closing fast.

The Environmental Improvement Plan is one of the four cornerstones of England’s post-Brexit environmental governance system, together with a duty on government ministers to take environmental principles into account in their policy making, legally binding targets to restore nature, improve air and water quality and tackle waste, and an independent oversight body, the OEP, to hold government ministers and public authorities to account on their environmental commitments and obligations.

How does the EIP25 differ from EIP23?

In [this analysis](#), we highlight some of the improvements in EIP25, including the clearer format for commitments and actions and the publication of [thirteen delivery plans](#) on the Environment Act targets. While still lacking detail and quantification, these plans are a welcome step forward and can be updated in a more agile manner than through a full review of the EIP itself.

There are positive steps forward in some policy areas, for example the promising direction of travel towards a chemicals regulation system more aligned with EU REACH, which would provide stronger protection for the environment and human health, and significant savings to the public purse.

Some existing commitments are rolled forward but without any greater specificity on timing, such as the perennial promise to legislate to end the sale and supply of horticultural peat products “when parliamentary time allows”.

In other areas, stakeholders warn that commitments in EIP25 have gone backwards. For example, Pesticide Action Network UK has [said](#) that EIP25’s proposals on reducing the use of harmful pesticides demonstrates a “shocking lack of ambition”.

While EIP25 is the flagship delivery plan for the government on the environment, a series of other plans and strategies are expected in 2026, including the Land Use Framework, 25-year farming roadmap and Circular Economy Growth Plan, as well as an access green paper and a white paper setting out proposals for reform of water regulation. These will need to be implemented as a coherent package to deliver the step changes needed to meet the Environment Act targets.

The Defra policy pipeline has moved forward sluggishly with commitments often delayed or vulnerable to political changes from other parts or processes of government such as reshuffles and spending reviews. The proximity of vital 2030 domestic targets on species abundance and international pledges on protecting 30 per cent of land and sea for nature brings an imperative to propel that pipeline forward with renewed pace and ambition.

The political context for delivering EIP25 must also improve. The prime minister’s absence from both the content and launch of the plan was concerning, given his predecessors’ visible commitments to EIP23 and the 25 year environment plan. The ‘nature bashing’ rhetoric that he and other government ministers have resorted to in discourse on economic growth must be ditched in favour of a more collaborative and pro-environment spirit, in keeping with the legal duty on all ministers to pay due regard to environmental principles when proposing or revising government policy.

The cycle of monitoring and scrutiny of the government’s environmental improvement plans has proven to be clunky and confusing. The retrospective nature of the OEP’s progress report means that its reports focus on actions in the previous financial year, although have latterly built in some analysis of future prospects.

The government’s response to the OEP’s reports, as well as the publication of its own annual progress report, have occurred at different and sometimes unpredictable intervals, which has led to confusion. Furthermore, the government’s reports have, to date, been more cursory than the comprehensive assessments from the OEP, and have lacked the quantified, evidence-based approach needed to direct resources and action to where they are most needed.

The frequency and format of the reporting and scrutiny cycle should be re-examined as part of the 2026 post-legislative scrutiny of the Environment Act 2021.

The link between nature friendly farming and goal 1 (restored nature) and goal 3 (to ensure English waters are clean, resilient and plentiful)

Agri-environment schemes are clearly central to delivering the restoration of nature under goal 1 and to reducing water pollution under goal 3. The three Environmental Land Management Schemes (the Sustainable Farming Incentive, Higher Tier Countryside Stewardship and Landscape Recovery) are cited extensively in EIP25 as routes to delivering the habitat creation needed to end nature declines, deliver 30by30, and improve water quality.

The forthcoming Land Use Framework will be central to ensuring habitat creation is targeted at the areas where farms find it difficult to make a profit from food production, and where the productivity of land is lower. **The Land Use Framework must be published in early 2026 to guide spending to these areas, particularly in National Parks and the uplands.**

The Land Use Framework is expected to aid government decisions about where to prioritise funding through agri-environment schemes, should farms in those areas choose to apply. As such, it will not infringe on farmers' autonomy but will help to deliver value for taxpayer money.

The delivery pathways do not assess how much of the available farming budget should be spent on the different Environmental Land Management Schemes. This is a crucial decision as the schemes are distinctly different.

Assessments by Green Alliance of what is required to meet the climate and nature targets suggest that half the farming budget should be spent on the Sustainable Farming Incentive, with the other half spent on Higher Tier and Landscape Recovery.

In that light, there is concern about whether the £50m – approximately 2 per cent of the annual budget – set aside for Round 1 and Round 2 Landscape Recovery projects is enough.

In addition, the issues with contract clauses must be rapidly fixed so that these projects can move into the implementation phase, and a new round of Landscape Recovery should be announced for 2026.

More broadly, the 25-year farming roadmap should set out how the three Environmental Land Management schemes will develop, confirming that all three are here to stay, with predictable application windows.

The target to end nature declines by 2030 still lacks an evidence-based delivery plan. Despite this being a quantified target, Defra has not yet quantified whether its new delivery plan is capable of delivering the target, in the way the Carbon Budget Growth Delivery Plan does for carbon emissions.

The delivery pathway does reference various modelling projects underway which will improve this. Given the proximity of this target, these projects must be prioritised, with their outputs published for scrutiny. Evidence needs to be made available to demonstrate that the actions set out to reduce water pollution from agriculture can deliver the 12 per cent cut required by 2030.

Goal 5 (to minimise waste by designing it out of the system, reusing and recycling materials wherever possible) and Goal 6 (to ensure that natural resources are produced, managed and consumed sustainably)

On waste, EIP25 largely restates existing commitments from EIP23 and points to the forthcoming Circular Economy Growth Plan (CEGP) for further measures. That plan is expected to be published later in 2026.

While ending the throwaway society was one of the previous Defra Secretary's [five priorities](#), it is yet to be championed with the same degree of passion by the current Defra Secretary, despite the [strong links](#) between a circular economy and economic growth.

The interim targets are unchanged in terms of ambition, though the delivery deadlines have been pushed back from January 2028 to December 2030 due to delays in implementing the collection and packaging reforms.

Long term ambitions to eliminate avoidable waste by 2050 and double resource productivity by 2050 are absent from EIP25. This leaves a gap in strategic targets to drive more efficient resource use, which the CEGP must address. Targets also continue to exclude major mineral waste, meaning the majority of waste is not in scope.

Current and planned commitments in EIP25 account for only 82 to 100 per cent of the residual waste reduction needed to meet interim targets for specific material streams – the measures to fill gaps are yet to be specified.

The targets focus narrowly on residual waste per capita and exclude the majority of waste, which arises in the construction industry. It also focuses on end of pipe solutions rather than prevention and reuse, as is the case for the priority stream of food waste, which is addressed mainly through collection rather than prevention. There are no targets for waste prevention, reuse or repair and the majority of waste.

Goal 6 on resources was not considered as part of the overarching approach to the circular economy in EIP2023 and focused narrowly on natural resources like timber, farming and fish.

Its incorporation into the wider circular economy chapter in EIP2025, then, means a number of resources are glaringly absent. Some material streams are missing, including minerals, many of which are vital to the economy, and manufactured goods are largely absent. There is no overarching target related to [resource use](#), although we use more than twice what the UN considers sustainable.

What the government needs to do to deliver Environment Act targets on waste

The government must identify and commit to measures to close the remaining 0 to 18 per cent gap beyond existing collection and packaging reforms.

It must deliver an ambitious and achievable CEGP, securing reductions in waste and, more crucially, resource use, going beyond recycling. It should:

- Set a long term goal to bring resource use within planetary boundaries as a ‘north star’ to guide action.
- Rebalance the investment environment to enable circular businesses to thrive and use government procurement to support circularity.
- Establish sector specific roadmaps beyond recycling to drive change in high impact industries.

The delivery plan on the Environment Act residual waste target should be updated after the CEGP is published.

It should also broaden the scope beyond recycling to include manufactured goods, mineral wastes and food waste prevention, with clear signals on product durability, reuse and material efficiency.

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