

Board Paper

Date

2 March 2026

Title

Report of the Chief Executive

Report by

Natalie Prosser, Chief Executive

Paper for information and decision
Open in part

Summary

1. There have been significant developments in the four months since my last report to the Board, both in the development of environmental law and policy in England and Northern Ireland, in our contribution to environmental protection and improvement, and in our organisation.
2. This paper updates the Board on our engagement with the UK Government's refreshed EIP, the Water White Paper, the development of the first Environmental Delivery Plans and the Nutrient Action Programme in Northern Ireland. It sets out the reception to our environmental law report on protected wildlife sites and our annual progress report, the steps taken in several of our investigations and activities we have undertaken in our priority programmes.
3. We look forward to our report on the Nutrient Action Programme in Northern Ireland, which the Board considered in its last meeting. The Board will consider separately a report on inspections in the waste and installations sector and look forward to the priorities in our business plan for 2026/27.

Recommendations

4. The Board is recommended to consider and comment on progress against our strategic objectives.
5. The Board is recommended to consider the role definition for a Board Critical Friend, developed as one of the agreed actions of the Board's effectiveness review

Sustained environmental improvement

Monitoring and reporting on environmental improvement in England

6. The EIP25 was published on 1 December. [In a statement](#) we set out that we considered it an improvement on the EIP23, that it was a more coherent and transparent plan but with areas where it could be strengthened. [We published a briefing note](#) setting out a fuller initial assessment of the EIP25, associated Environment Act 2021 target delivery plans and the EIP25 monitoring framework alongside our 2024/5 EIP progress report.

7. In early January, [we published our annual progress report](#), supported by an on-line media briefing, an in-person event for key stakeholders, an on-line event for a broader audience, as well as a video of our presentations hosted alongside the report on our website. Minister Creagh and the Chair of the Environmental Audit Committee attended the in-person event and gave the first interventions in the Q&A session. Toby Perkins MP also issued a supportive press statement, and Minister Creagh a Written Ministerial Statement. Stakeholder feedback was positive, with the report now seen as an important event in the sector's annual calendar and a definitive record of progress.
8. This year, we developed more visual communications material and a more comprehensive approach on social media. The visual materials assisted a number of NGOs to develop supportive and effective on-line content for their own audiences. Overall social media were positive and reflective of our key messages. There was not extensive mainstream or broadcast media coverage, but the report did feature in the Guardian, BBC and PR copy throughout regional news networks. Our Chief Scientist appeared on the ENDS podcast. This likely reflects the overall messages being similar to previous years. We are developing materials and engagement opportunities based around the findings for each chapter of the report.
9. Professor Cathy Maguire, the Chair and I appeared before the Environmental Audit Committee on the 28 January to discuss the findings of our report. The Committee asked broad and detailed questions in relation to our findings and highlighted the usefulness of the report to them. The Chair and I also appeared before the Lords' Environment and Climate Change Committee, with Professor Robbie McDonald, on the same day to discuss this report along with our report into protected wildlife sites.
10. Since publication we have presented our report to the cross-government board for EIP delivery, the Defra Group environment board and the Climate and Environment Hub of the UK Parliament.

Monitoring and reporting on environmental improvement in Northern Ireland

11. DAERA published its first Northern Ireland Annual Progress Report at the end of January. [We issued a statement](#) welcoming its clear and transparent approach. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.* This provides a useful basis for our progress assessment and should reduce the time we need to spend compiling an overview of activities in NI compared to England.
12. The NI EIP assessment is progressing as planned and we are on track to have the draft analytical sections ready for peer review in mid-March. The Board will separately consider the draft findings at their meeting on 8 April.

Research and evidence

13. Following the Board's approval, our research strategy will be published internally as part of a revision of the intranet. We are integrating the strategy into wider work on how to start and run projects, and are working to ensure that research projects are integrated into the Intelligence Management System.
14. We are engaged with the Government Office for Science and the wider cross-government research community, to ensure that the external facing Areas of Research Interest (ARI) document the Board agreed reaches its intended audience. We are part of the ARI cross-government community and in February attended a symposium on how best to frame ARIs and

engage with the academic community to maximise their value. We are reflecting on these lessons ahead of publication on the ARI Database.

15. Since my last report we have commissioned projects to review the monitoring and regulatory landscape for contaminants in UK marine waters, to review the capacity to manage persistent organic pollutants in waste, and an evaluation of approaches to addressing the nutrient surplus in Northern Ireland.
16. Through the contaminants in UK marine waters work we will seek to understand the types, source pathways and impacts of contaminants on marine species, ecosystems, and water quality, emerging contaminants not currently considered in the GES framework, and the key regulatory and policy levers to control contaminants.
17. A review of the capacity to manage persistent organic pollutants in waste will inform the OEP's prospective analysis of progress towards the EIP commitment to substantially increase the amount of persistent organic pollutant material being destroyed or irreversibly transformed by 2030. It will identify the challenges and considerations related to the disposal and incineration of POPs, and the barriers, enablers and costs associated with incinerating such waste to understand which factors influence progress to the greatest degree.
18. An evaluation of approaches to addressing nutrient flows in Northern Ireland will provide a framework to monitor and evaluate government plans to reduce the nutrient surplus in Northern Ireland.

Better environmental law, better implemented

Protected Wildlife Sites

19. [We published our report](#) on protected wildlife sites in England in early December and are engaged in a range of work to bring it to a wide audience. We wrote to, engaged with and ultimately gave oral evidence to the Lords' Environment and Climate Change Committee, where we were able to set out our key messages and highlight areas of alignment with the Committee's past work. We held online events attended by over 150 stakeholders and are speaking at external events organised by UKELA, external lawyers and the Institute for Environmental Sciences. We have contributed articles to the latest editions of *British Wildlife* and UKELA's *eLaw* journal. We will continue to look for more opportunities to amplify our messages from our work in order to maximise our influence.
20. We met with Defra and Natural England as government's response was developed to make the case for our recommendations. The government laid [its response](#) on 2 March which largely points to its existing work, much of which was underway when we carried out our review, and commits to little that is new or different. [We issued a statement](#) in response to welcome that Defra has accepted a small number of our recommendations, but reaffirm that Government needs to go further and faster. This response took a firmer tone than is usual, given our level of concern around government's progress and the risk this presents to achieving relevant targets.

This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs and it relates to information recorded for the purposes of OEP's functions relating to investigations and enforcement.

Nutrient Action Programme

21. We brought forward a business-wide exercise to update conflict of interest declarations with explicit consideration to the NAP Regulations' report. All staff complied before the end of February. Conflicts are declared by staff and reviewed in conjunction with line managers to ensure actual or potential conflicts are appropriately mitigated.

Other activity

22. The Board will separately consider our report on inspections regimes in the waste and installations sector.
23. In December, we were invited by the House of Lords' Industry and Regulators Committee, to contribute to the Committee's inquiry into the role of regulators. Our response (Annex A) highlights a number of points that influence the effectiveness of environmental regulators from our scrutiny of the implementation of environmental law. We link to our reports with the most relevance to the inquiry and provided our assessment of the attributes of effective environmental regulation. We will publish the letter in due course in line with normal conventions for submitting evidence to Parliament.
24. In our EPPS report published in February 2025 we recommended that the HM Treasury Green Book, as well as other key cross government guidance and templates, be updated to include reference to the EPPS duty. We have been engaged with officials in HMT since, including in recent months on draft text for amendments to the Green Book. On 5 February, Government published its revised Green Book, in which we were pleased to see reference to the need to have due regard to the EPPS duty, and additionally the need for practitioners to consider legally binding Environment Act targets. We welcomed the additions to the revised Green Book [in a public statement](#), via social media, and in an interview carried by the ENDS podcast. We judge that sustained and effective engagement has enabled us to achieve impact. HM Treasury have committed to engage further in relation to changes to the related Business Case guidance.
25. We continue to have good engagement with DAERA officials in relation to the EPPS in Northern Ireland. We understand that, following its scrutiny processes, the AERA Committee will confirm they are content with the draft EPPS. This means that the EPPS is now likely to be laid before the Assembly and published in March, and the duty to have due regard will take effect in September 2026.
26. We intend to respond to DAERA's consultation on their draft statutory Nature Recovery Strategy, which ends on 18 March. Our response will focus on whether the strategy addresses the recommendations in our Northern Ireland protected sites report. We will also provide broader comments on the comprehensiveness, credibility and coherence of the actions in the strategy, reflecting the approach we are taking in our forthcoming assessment of progress in delivering the Northern Ireland EIP.
27. In December 2025 government launched a public consultation on wide-ranging changes to the National Planning Policy Framework. We intend to respond to this consultation ahead of the 10 March closing date, and will circulate our response to the Board. There are several matters that we support - such as the inclusion of references to legally binding targets, and Local Nature Recovery Strategies - as well as areas where we consider the NPPF can be strengthened, including in relation to the protected landscapes duty and Environmental Delivery Plans. We also have an interest in the application of the EPPS duty to the policy revisions.

28. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*
29. We attended the second meeting of the UK and EU environmental cooperation forum under Article 395 of the Trade and Cooperation Agreement in Brussels, along with officials from the Interim Welsh Assessor and Environmental Standards Scotland alongside Defra and the devolved governments. Topics discussed included the circular economy, bioeconomy and chemicals.

Water White Paper

30. We have met with the Defra team to discuss the Government's water reform White Paper. While its general statements of ambition and direction are broadly welcome, the White Paper leaves most of the substance yet to be presented, including through the upcoming 'Transition Plan'. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.* In the first instance, we have sent a limited set of initial observations to responsible Defra officials (Annex B), highlighting how our work on the water environment can be used to assist with the further development of the reforms. Defra has welcomed the offer of knowledge sharing sessions on this work.
31. We emphasise the need to develop a whole system approach that addresses all pressures on the water environment, noting that the White Paper is largely concerned with the water industry. We also note the importance of establishing how the creation of a new, single water regulator will affect wider, integrated approaches to environmental protection and the ongoing functions of existing regulators. Additionally, we highlight the need to effectively implement existing law in parallel with developing new policies, pointing to our investigation. We expect to have more to say in these and other areas as the policy develops, based on our previous work.

Environmental Delivery Plans

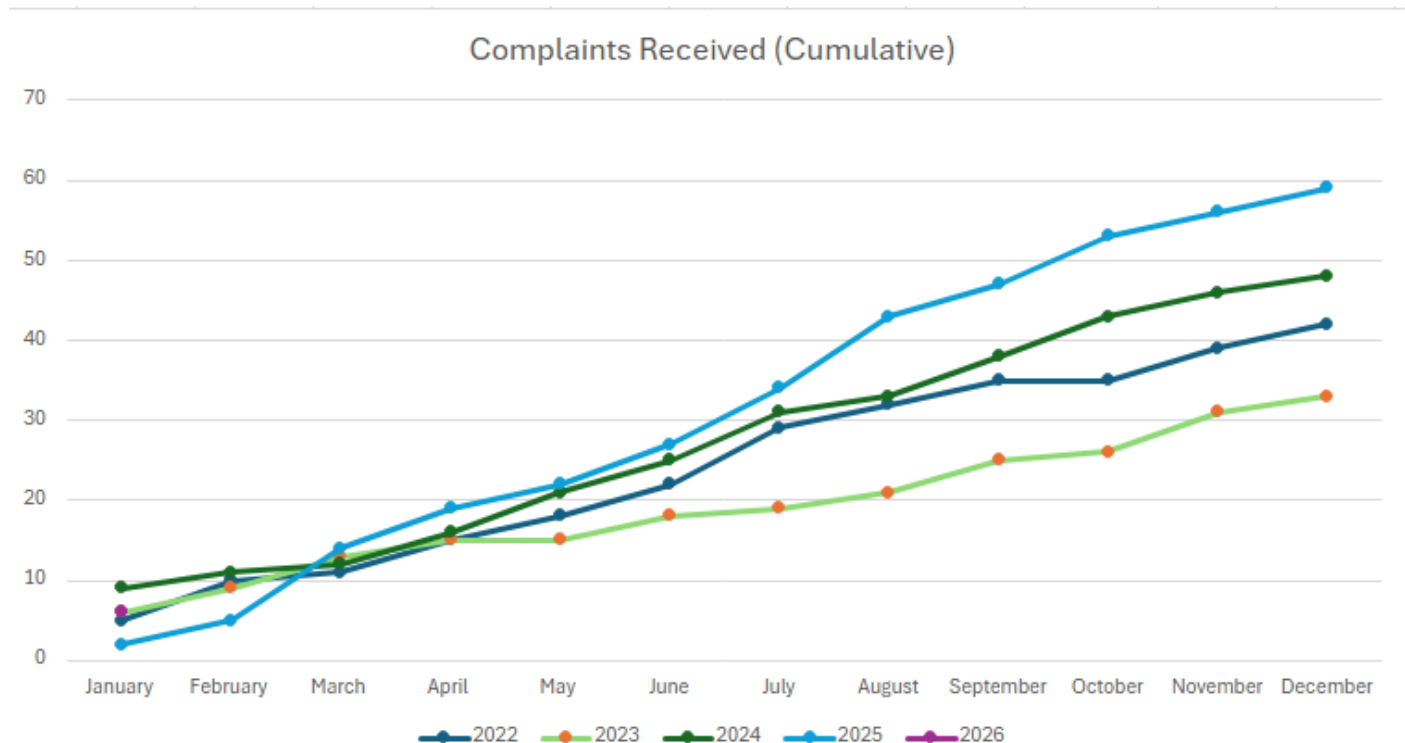
32. Natural England continues to engage with us constructively as it develops its first Environmental Delivery Plan which will focus on nutrients in Norfolk. We provided comments on a prototype EDP before Christmas, assessing the proposed design, how it is intended to be implemented, and how it proposes to meet the 'overall improvement test'. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*
33. Natural England [intends](#) to prepare sixteen EDPs for nutrients and seven for great crested newts. The Government committed to providing its 'initial learnings' to Parliament on its first EDPs before it moves onto new areas. We expect to see these initial learnings soon after the first EDP is made. We anticipate responding to the consultations on the first EDPs (first nutrient EDP and first newt EDP) and we may also wish to comment publicly once government has published its initial learnings. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*

Improved compliance with environmental law

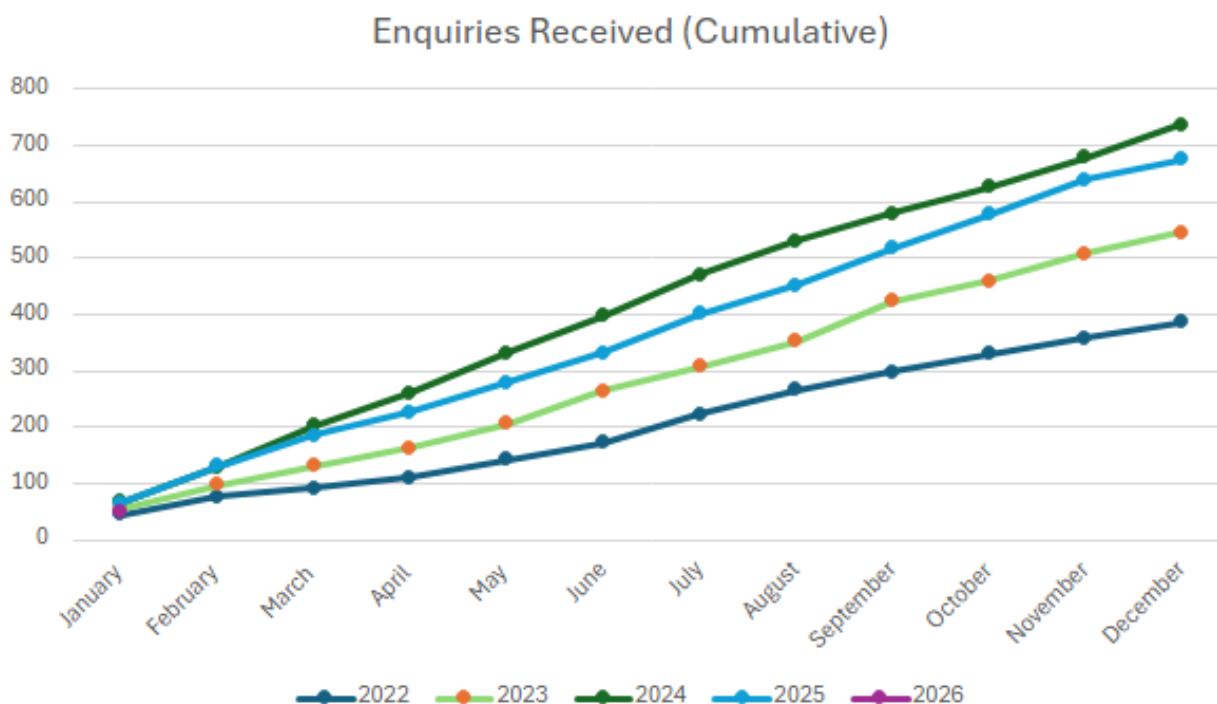
Complaints and enquiries

34. We received 59 complaints in calendar year 2025, a 22% increase on the previous year. We received 675 enquiries, compared with 737 the previous year. This reduction coincides with our efforts to improve signposting and information on our website for those considering submitting enquiries to the OEP. January 2026 saw this trend continue with 51 enquiries (2025: 66) and 6 complaints. We have 4 complaints and 2 whistleblowing cases open at the assessment stage.

35.



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37. *This section has been redacted as it relates to information recorded for the purposes of OEP's functions relating to investigations and enforcement.*

Progress of investigations

38. [We published our reports](#) in relation to our investigation of Combined Sewer Overflows in December as the Board approved in November. The reports generated some media interest, but attention has shifted towards the Water White Paper. We will monitor progress against our recommendations in six months, which is likely to involve engagement with officials leading on the White Paper that the recommendations are appropriately taken forward.

39. *This section has been redacted as it relates to information recorded for the purposes of OEP's functions relating to investigations and enforcement*

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Organisational excellence and influence

Financial performance, funding and audit update

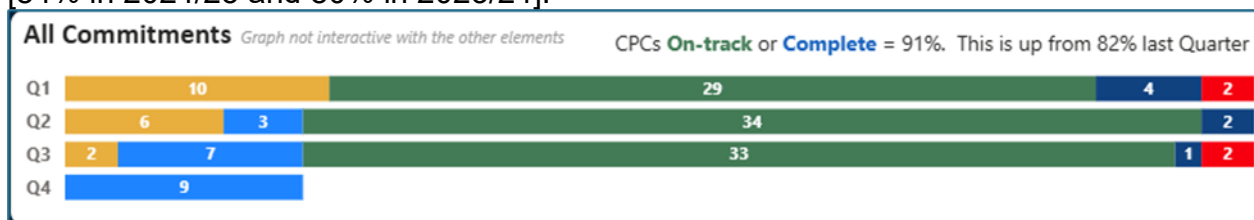
41. [Our Annual Report and Accounts for 2024/25](#) was laid in February following its approval by electronic business. There was a small amount of sector media coverage of our statements in relation to the sufficiency of our funding. The National Audit Office presented a plan to the Audit and Risk Assurance Committee in February with the aim that our next Annual Report will be laid before the summer recess, and we are working towards this timetable.

42. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs. We applied our 2025/26 pay award in December's pay to staff.*

43. Defra confirmed flat cash RDEL funding of £8.451m excluding depreciation for the next three years from 2026-27 to 2028-29 as we had expected. We are still awaiting funding confirmation from DAERA. The Board will separately consider a finance report and a draft budget and business plan for 2026/27.
44. The Government Internal Audit Agency presented a proposed annual audit plan for ARAC's consideration in February. ARAC endorsed that we would undertake three audits this year, compared with four as we have in recent years. ARAC also noted that additional risks may emerge as the 2026/27 budget and business plan are finalised, given the Board's steer to hold our enabling activities as 'flat cash' this year which incorporate many of our operational assurances and controls. ARAC may convene additionally to consider these risks ahead of the Board's meeting, at the discretion of the ARAC Chair.

Delivery progress

45. At the end of December (P9), we reported 91% of our corporate plan commitments on track or complete. Two are off-track, two are at risk and one has not started. This is improved from the end of September and would be an improvement on the progress we reported in prior years [84% in 2024/25 and 80% in 2023/24].



The commitment not yet started at time of reporting has now begun, and was always intended to complete in future years. The commitments at risk are those relating to:

- the development of our approach to assessing the prospects of achieving long-term targets, which has not progressed as quickly as we had intended given resourcing pressures in the teams delivering two progress assessments this year
- the progress of our evidence gathering in respect of chemicals pollution, waste management and the circular economy, given some delay to the initiation of planned work

The commitments that will not be met are:

- in relation to the publication and implementation of the framework document with Defra, though this may be considered by the Board in its April meeting. We have recently received an updated template to reflect the decisions made by the Secretary of State in relation to the protection of our funding. We are also reviewing a side letter appended to the previous draft framework document, which sought to clarify arrangements in relation to our pay award.
 - our intention to publish a synthesis of evidence gathered in our marine programme in recent years. Having considered our approach, we do not think this would be a value-adding element to our work, given our investigation and future plans, and so have deprioritised this activity. All the concluded individual evidence reports are published.
46. We track the projects which contribute to delivery of our corporate plan monthly. The picture at the end of January (P10) was improved, with only one project assessed as likely to be at risk at year end.

People matters

47. We launched our refreshed People Strategy in January 2026 following the Board's approval in December, with follow up sessions planned in directorates ahead of our staff event in March. We are hosting our staff event virtually this year to mitigate costs.
48. As part of the agreed delivery plan for the People Strategy, we have developed a succession planning policy and approach. We also instigated a new strategic people focussed executive meeting to allow a broader consideration of our people issues.
49. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*
50. Since the Board's last meeting, we have welcomed two new joiners, and five colleagues have left the OEP. Three of the leavers were in temporary positions we created this year as part of our plans to add capacity in areas needed to deliver our plans. These posts will not be replaced, so this results in a net reduction in our capacity. One leaver held a maternity cover post now ended, and we now have one vacancy in a permanent position in our Insights team.
51. *This section has been redacted as it includes personal data.*
52. *This section has been redacted as it includes personal data.*
53. *This section has been redacted as it includes personal data.* Kate Tandy has been appointed as Acting General Counsel. This followed an internal Expressions of Interest process. We are managing the impact on the capacity of our legal team.

Board recruitment and induction

54. We're grateful to the Board for attending to mark Dame Glenys' departure from her five years as OEP Chair. The appointment of Julie Hill as Interim Chair was [announced by Defra](#) at the start of February, until the end of May. The advertisement for a permanent Chair closed in January, Defra completed its shortlisting in February and we understand interviews will have taken place by the time the Board meets. Decisions for a permanent Chair are made jointly by the Secretary of State in England and the DAERA Minister, and are subject to pre-appointment scrutiny by the relevant select committees. The timing of any appointment is therefore uncertain, and influenced by Parliamentary recess. We continue to press in relation to the Board members terms expiring in the year ahead.
55. As part of the action plan from the Board's effectiveness review, we have defined the role of a Board Critical Friend. A role description is set out at Annex D.

Improving the OEP

56. Within our programme of activities to improve the OEP, we have concluded the final steps in our work to improve project management. We have launched a refreshed suite of templates and guidance for initiating a project, which aim to simplify process whilst enabling more robust consideration of our routes to impact, bring forward how we consider communications and stakeholder engagement, and ensure we are drawing on lessons from our earlier work. Aligned with this, we have developed a structured approach to make consistent our approach to identifying, and learning lessons, and established a regular peer support forum for Project Leads to gather, and consider these amongst other topics. We have simplified and made more efficient how we assure application of good practice in projects. Our internal auditors are considering these, as well as our future assurance approach as part of their audit of our project management approach which will report to ARAC in its next meeting.

57. On the anniversary of publication of our strategy, we took stock of how our approach to issue-based working is being implemented, where improvement was a core aim of our refreshed approach. Our review found that issue-based working is well understood and endorsed across our teams. We have examples of good practice, and areas to improve. These largely relate to the flow of information through our teams, including by making better use of the insight provided by our progress reports. We presented case studies of good practice to staff in January.

Corporate and Enabling Services

58. Following a successful procurement, we have awarded a contract for the implementation and ongoing management of Sage Intact, a cloud-based accounting system. We anticipate the project will run from March-May and will deliver a step change in the availability and usefulness of financial information to the business as well as operational efficiency improvements.

59. We have built a Copilot Agent to help staff get accurate answers to HR related questions. Copilot Agents are instances of Copilot where we specify where answers can be derived from - in this case, only from HR created policy documents. We aim to roll out the tool in March. We hope this will reduce demands on HR colleagues, and traffic to the HR inbox. We are also exploring the development of a Copilot AI agent to support colleagues to make better use of intelligence held within the Intelligence Management System.

60. Our new complaints management system is now live. The system is hosted in our secure environment, and integrates with outlook and our website complaints webform. It also has features that enable better reporting and a more efficient way of managing complaints. Over the coming months the team will assess the benefits of implementation and consider feedback to understand any potential avenues to further improve the system in the next financial year.

61. We have had three mobile phones and one laptop reported as lost since the last report. The laptop has since been recovered. A returned laptop was erroneously given to a charity, due to an error by our IT provider Boxxe. In all instances, we were able to confirm there was no unauthorised access to data and no attempts to do so.

Selected Stakeholder Engagement

62. Outside our engagement in relation to our work on protected wildlife sites and our progress report, I gave a keynote speech at the Coastal Futures conference, the largest marine-focused event in the UK, on 29 January. This allowed us to introduce our work on the marine environment to a broad range of relevant stakeholders. Our involvement at the event was well-received.

63. The Chair and I met with the Secretary of State in the week prior to Dame Glenys' departure from her role. The meeting gave opportunity for us to outline the role of the OEP, and our contribution to environmental protection and improvement.

Impact Assessments

Risk Assessment

64. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*

Equality Analysis

65. No material equality implications have been identified in this paper.

Environmental Analysis

66. This report gives an overview of strategic organisational developments which support the OEP's principal objective. Consideration has been given in each case to how the activity contributes towards environmental protection and enhancement, and to ensuring the OEP meets relevant duties in environmental law. No specific proposal in this paper has a direct bearing on those duties.

Paper to be published	In part
Publication date (if relevant)	With meeting minutes
	FOIA/EIR exemptions for which we propose not to publish this paper in full are: • publication would harm relations between UK and NI governments (s.28) • publication would harm the effective conduct of public affairs, including the Board's ability to receive candid advice and engage in free and frank discussion (s.36) • publication would reveal information subject to legal professional privilege (s.42) • publication would harm the OEP's commercial interests (s.43)

ANNEXES LIST

Annex A – Letter to Baroness Taylor of Bolton

Annex B – White Water Paper Letter

Annex C – Confidential

Annex D – Board Critical Friend Guide

Annex E - Strategic Risk Register

Annexes A and B have been redacted as they contain information available elsewhere.

Annexes C and E have been redacted as publication would be prejudicial to the effective conduct of public affairs.