

Board Paper

Date

30 June 2026

Title

Report of the Chief Executive

Report by

Natalie Prosser, Chief Executive

Paper for information and decision**Open in part**

Summary

1. This has been an active period for the OEP, with conclusion of some significant projects, not least our first EIP progress report in Northern Ireland, and our investigation into emergency authorisation of neonicotinoids. Alongside that, this report updates on a range of 'targeted and tactical' interventions to support the strategic intent of our work programmes through responses to consultation, advice, and evidence to Parliament.
2. I report on an active period of engagement. The Board will meet with the Defra Permanent Secretary, Chair of the Environment Agency, the RSPB and Green Alliance following its meeting, providing an opportunity to hear direct from important stakeholders with shared interest in environmental protection and improvement.
3. It has similarly been an active period internally, as we initiate projects expected in our business plan, and bring others to conclusion, as well as welcome our new Chair.

Recommendations

4. The Board is recommended to consider and comment on progress against our strategic objectives.

Sustained environmental improvement

Monitoring and reporting on environmental improvement

5. I approved minor amendments to the Northern Ireland progress report in conjunction with the Chair, and Julie Hill, as the Board delegated in May. In line with the Board's discussion, final amendments focused on the Foreword and Executive Summary and more explicit recognition of the policy foundations that had been put in place in recent years.
6. We launched our report on 24 June, with an event attended in Stormont by around 70 stakeholders. Minister Muir and AERA Committee Chair Robbie Butler both spoke positively at the event, including about the OEP. An online event attracted a further 40 stakeholders. We secured significant media coverage of the report, especially across broadcast media and the

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two main broadcast channels in Northern Ireland, BBC NI and UTV. We were very pleased with the reception, of this, our first Northern Ireland report.

7. We have continued to engage with Defra on the substance of our next assessment and how both parties will develop our progress reporting for the EIP25. We agreed to set out a programme for regular engagement at key points in the process and to have more early engagement which could lessen the need for information requests.

Research and evidence

8. Our Areas of Research Interest document will soon be published on our website and on the cross-government ARI database, in order to facilitate our engagement with academics, researchers and research funders, and so we can improve the visibility of OEP research, and incorporate additional reviews of OEP research.
9. We are finalising the procurement for a project looking at international implementation of Invasive Non-Native Species Pathway Action Plans. This work will start in July with findings due in September, in time to inform the biosecurity chapter in the England EIP report.
10. The marine evidence programme identified Marine Protected Areas as a key measure for nature conservation, with the licensing system, and management of marine non-licensable activities (mNLA) providing mechanisms for managing potentially damaging activities. We undertook internal research that evaluated the effectiveness of the implementation of these systems and concluded that there is a need to examine the regulation underpinning the licensing system, but the framework for managing mNLA is not sufficiently developed or implemented to enable a robust assessment. We have recently shared this internal evidence report with the Marine Management Organisation and Defra for fact checking. Dan Laffoley was the critical friend for this project and provided valuable insight and challenge.
11. We have held seminars across the OEP on this research, and other work relating to marine plastics. We have also had speakers in relation to a 'Just Transition' in Northern Ireland, and species reintroduction.

A well adapted UK

12. The Climate Change Committee's report [A Well-Adapted UK](#), part of its five-yearly independent assessment of UK climate risk, was published in May. The report provides a hard-hitting and sobering assessment of the state of adaptation, finding that current plans are insufficient to address the scale of the challenge. It also sets out a comprehensive package of solutions. The priority risks identified are directly relevant to us, including risks to the state of nature, the viability of farming, and water availability. These risks will impact the effectiveness and delivery of the England and Northern Ireland EIPs, as well as the prospects of meeting environmental commitments. A short briefing note is available [here](#). Baroness Brown, Chair of the Adaptation will attend the Board's meeting in August to explain the assessment in more detail.

Farming Roadmap 2050

13. Defra published its Farming Roadmap 2050. This provides some clarity and sets out specific actions to 2030, including policy changes, scheme development and progress indicators. If implemented effectively, it could help build confidence in the farming sector, which will be essential to getting nature-friendly farming right. The roadmap aligns in intent and indicators with the Environment Act species abundance targets. However, it does not set out a delivery

pathway for meeting those targets or add clarity beyond the high-level target delivery plans in EIP25. It addresses many of the OEP's agriculture-related recommendations, but limited detail on how government will achieve its full 2050 vision for a productive, profitable and sustainable farming sector.

Better environmental law, better implemented

Nutrient Action Programme and related issues

14. Following discussion at the last Board meeting, and the update at the extraordinary meeting, our advice to the Minister on the proposed Strategic Ammonia Reduction Programme (SARP) was submitted. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.* Further opportunities to articulate the fundamentals of the advice, in relation to Article 6 of the Habitats Directive, and the balance between proactive and reactive measures, will arise in the departments' consultation on the Nutrient Action Programme regulations.
15. Development of the revised proposals for these regulations has been ongoing. We expect publication and initiation of a second consultation as this paper is being finalised. We will respond. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*

Waste inspections

16. Our report on inspection regimes in the waste and installations sector was published on 14 May 2026. Publication followed extensive engagement with the Environment Agency both in the development of the report and to ensure 'no surprises' around our findings and key messages. The report received coverage on Channel 4 News, including an interview with the Interim Chair, as well as in the Times and ENDS. As anticipated, the Environment Agency response pointed to the age of the data considered in the report and work already undertaken to address issues raised in the report. Our communications similarly recognised progress made but also pointed to improvements still needed in the future.

Water programme

17. I have approved initiation of two projects within our planned water programme, since the Board last met. The first considers sewage sludge in England. We intend to take a broad view of the generation, content and management of sewage sludge, looking at what problems it poses and where those stem from, rather than focusing on the end stage regulation of sludge once it exists. This is to complement, and add to, work Defra is undertaking on the planned transfer of the control of aspects of the management of sewage sludge into the Environmental Permitting Regulations.
18. The second defines the next stage of our work on diffuse agricultural pollution in England, after evidence gathered in prior years. This project will look at the effectiveness of the requirements and implementation of three sets of regulations we have identified as more critical to environmental outcomes – the Farming Rules for Water, Silage, Slurry and Agricultural Fuel Oil Regulations and the Nitrates Regulations. We will aim to use the findings to inform Defra's planned consolidation of these regulations, seeking to highlight opportunities for improvements in the substantive requirements and how they are applied. We had planned this work last year

but slowed it down to in light of delays to Defra's review. We are undertaking this work now given further lack of pace and progress in this review.

19. We continue to engage with Defra and other stakeholders in relation to the government's ongoing water reform programme, including meeting Professor Dame Julia Black – Senior Adviser to the Secretary of State on Water Reform, and the newly appointed Directors for the programme. We held a round-table on reforms with environmental NGOs. There is currently little by way of clear developments or proposals for us to consider. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.* In the meantime we also continue to develop our thinking on what might make for an effective approach to setting new water targets, which the government has committed to doing, so that we are well placed to offer our views when an opportunity arises.

Other activities

20. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.* Given that this is a material issue, we are engaging now with the fishing industry, those who regulate bycatch (notably the Marine Management Organisation and Defra), and environmental NGOs in relation to our findings. On the basis of this work we expect to produce an environmental law report around the end of this financial year, as set out in the draft business plan.
21. In April, government published a suite of documents relating to Biodiversity Net Gain, including evidence relating to earlier amendments to these regulations, and a consultation on a targeted exemption for brownfield residential land from Biodiversity Net Gain. [We responded in May](#), setting out our view that the BNG regime, and early post-implementation changes, need to bed-in before any further reform can be considered in an evidence-based way. We highlight similar concerns as we have previously, that the cumulative effect of new exemptions undermine the regime, and is likely to have implications for nascent nature markets.
22. We provided evidence to the Environmental Audit Committee's call for evidence in relation to HM Treasury and the economics of climate and nature in May. The substance of this inquiry is relevant to projects within our environmental governance and nature programmes, as well as more broadly to our EIP monitoring work. Our response (at Annex A) highlights the significance of Treasury's role in supporting delivery of cross-government environmental ambitions, as well as in mobilising public and private sector funding and setting the rhythm and tone of planning and spending cycles. We also refer to the steps Treasury has taken to embed the EPPS and consideration of legally binding targets but highlighted where more can be done. We will publish our submission once the EAC has published its evidence.
23. We continue to have positive meetings with Natural England to discuss their draft Environmental Delivery Plan. The consultation on the first EDP, covering nutrients in Norfolk, is expected to be published next month (July). We met with MHCLG to discuss the draft levy regulations and draft prioritisation regulations. We did not have any significant concerns about these, and both sets of regulations have now been laid in Parliament.
24. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*

25. We responded to a request from Defra officials for our views to support the development of its memorandum to begin post-legislative scrutiny of the Environment Act (Annex B). *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.* We will consider whether and what additional activity may be purposeful, as the post-legislative scrutiny approach is decided in Parliament.

Improved compliance with environmental law

Complaints and enquiries

26. Since my last report we have received 7 new complaints, primarily focussed on the topics of nature and pollution control. In total we have 10 complaints currently being considered at eligibility stage, and 8 under full assessment. In the same period, we have closed 11 complaints.

27. We achieved early resolution in relation to the Environment Agency's application of a 5km screening distance when considering the impacts of ammonia emitting developments on Protected Sites. Evidence from the EA confirmed that a generic 5km screening distance was not always protective of those sites at risk of damage from ammonia pollution. As a result of our engagement, the EA has committed to a timebound action plan which will address the identified risks and provides a proportionate path to compliance without requiring use of our statutory enforcement functions.

28. Enquiry numbers have plateaued and are trending downwards. The vast majority remain signposted to other organisations. We expect that continuous improvements to the information we make available to the public on our website, and our approach to engaging and supporting enquirers has improved understanding of our role and played a part in this reduction.

Progress of investigations

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

30. The Chair and I agreed the final investigation report in relation to Operation Elder as the Board delegated in its last meeting and following the helpful suggestions of the Board. Changes incorporated the Board's feedback to improve clarity around how we identified and developed the grounds of the investigation, explain in more detail the rationale for finding no failure in relation to the precautionary principle, and be clear that our focus was on the decision making process, and not the merits of whether neonicotinoids should be authorised.

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33. We have agreed to become a notice party (usually known as an 'interested party' in English cases) in the Lough Neagh eel fisherman judicial review and await a court order to confirm. This means we can take part in the case should we wish to, in a similar way as if we were intervening, but we are not compelled to do so. We have made clear that we remain neutral between the parties and do not intend to make any submissions at this early stage when the case has not yet been granted 'leave' (permission) to proceed to a full hearing. The claimant is

challenging DAERA's alleged failure to comply with its obligations to safeguard and protect the lough. The case is relevant to our work, especially to issues considered in our Nutrient Action Programme report, Strategic Ammonia Reduction Programme advice and our assessment of non-compliances with the Water Framework Directive NI Regulations in relation to the recently published River Basin Management Plan. We will update the Board following the hearing to decide if the case can proceed, which is due in October.

Organisational excellence and influence

Framework document and Chair's letter

34. We and Defra each published the agreed framework document in May. We are engaged with our sponsorship team on a small number of matters where further steps are needed to implement the expectations of the document in full.

35. In June, our Chair responded to the Chair's letter received from the Secretary of State in May (Annex C and D). We expect issues relating to Defra's outcomes focus to form part of the discussions the Board has with the Permanent Secretary in its meeting, and to the Chair's first meeting with the Secretary of State, which will follow the Board's meeting.

FY2526 Annual report and accounts (ARA)

36. The audit has concluded successfully with no misstatements identified, adjusted or unadjusted. This outcome reflects the strength of our financial controls and our effective deployment of resources. It reinforces our track record of robust financial management and our commitment to disciplined stewardship of public funds. ARAC has considered the NAO's audit completion report, and the final ARA, which the Board has been asked to approve by electronic business before its meeting. We expect to lay our ARA before the Parliament and the Northern Ireland Assembly on 8 July 2026, as the Board meets.

Corporate plan, business plan and budget

37. On 25 June, DAERA confirmed that we will receive £1.900m of funding in Northern Ireland this year. This is in line with the assumptions of our budget and business plan, but above the indications that officials had given in most recent discussions. As a result of those earlier discussions, we had identified a number of projects in Northern Ireland to pause, so that we could be certain of our ability to spend appropriately between England and Northern Ireland. Those will now restart.

38. Whilst this is a welcome outcome, in context, it is well below (21% or £0.5m) the resources we believe to be needed to exercise our functions to the scale and scope intended in establishing the OEP, particularly given our duty to report on progress against the EIP annually from this year. We have written to DAERA to stress this, the impact of delayed funding and the benefits of a multi-year settlement. The sufficiency statement of our ARA also highlights the risks to sufficiency of our funding, particularly in Northern Ireland.

39. We will propose a final business plan and budget to the board in its meeting of 12 August, taking advantage of the opportunity to review performance in the first quarter before doing so. We continue to implement the draft business plan and budget, that the Board agreed. We are mobilising the plan as intended. We expect to publish the corporate plan the Board agreed alongside the Annual Report and Accounts.

People matters

40. We welcomed Dame Helen Ghosh as our Chair on 1 June, with an induction programme intending to help her orientate herself within the OEP, and support our work. We are engaged with Defra and DAERA officials in relation to those Board members whose terms expire in the next year, and our Chair will meet with Edward Barker, our senior sponsor, to discuss in the near future. We are actively pressing for progress.
41. Since the last board meeting four permanent staff and four temporary staff have left the OEP. *This section has been redacted as it includes personal data.*
42. This is more than we have experienced previously. We are making careful decisions about backfilling and will not backfill to all permanent posts cognisant of the medium-term financial picture. The advertisement for a permanent General Counsel will however be live imminently; the Board are encouraged to distribute the opportunity within their networks. We have welcomed two short term posts within our Insights team, with skills matched to our future work programme. *This section has been redacted as it includes personal data.*
43. We actively encourage work experience placements for school/college and university students, as part of our commitment to diversity, widening participation and developing ties with the local community. We are also particularly aware of the increasingly challenging employment market for young people and wish to play our part in supporting young people into work. We have hosted 24 students since 2022, 16 of which have been in the last year. These range in length from 1 or 2 days to 3 weeks, and range from school age students, to those mid-University degree. We have also been active members of the UKELA mentorship programme, hosting 2 undergraduate mentees in the last year. This has enabled us to foster connections with academic institutions engaged with this scheme. The recently concluded six-month internship for a recent graduate to gain valuable experience of work and make a meaningful contribution to bridge staff absences may also provide a template in the right circumstances in the future. Our intern was supported in applying for permanent roles and was successful in securing such a role with the CPS.

Improving the OEP

44. The aim of this programme is to close the gap to be the organisational excellence and influence our strategy sets out. In the last months, we have closed some of the work completed last business year and initiated the planned projects within the approved draft business plan.
45. We have concluded our 'efficiency project' undertaken largely last business year. This sought to generate efficiencies by testing how effectively the NAO and Cabinet Office's good practice guidance on public sector efficiency can be applied to our size and context. We ran activities in each of four drivers of efficiency: culture, process improvement, technology adoption, and buying. As predicted, the project identifies culture and technology (principally AI adoption) as the biggest efficiency levers at the OEP, with careful allocation of resource to local process and technology improvements needed given limited opportunities to leverage at scale. The project has applied lean techniques to improve some of our processes, streamlined some of our decision-making, supported improved the clarity of expectation and roles in our leadership cohort, amongst other items. We have a bank of efficiency case studies to inspire colleagues, and, following workshops with all staff, have produced guidance for staff: '[Proportionate, not perfect – a playbook for purposeful work](#)' - a key driver for us. While this project transitions to be driven by leadership as BAU, important work on our efficiency, in driving CoPilot adoption,

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considering our estates, experimenting with products, and how we optimise resources continues.

46. Following guidance from a completed internal audit, we have defined the assurance model which concludes our project management improvement project last year. A comprehensive suite of guidance and tools, clarified expectations, roles and responsibilities, and ongoing peer and central support mechanisms seeks to embed the gains.
47. Our focus this year is on our strategy refresh, people strategy, optimising our resources in light of future funding constraint and certain IT investments. I have agreed the initiation of our project to optimise our resources. This project delivers some of the actions the Board asked in the autumn, and will assess operating model options to help the organisation use resources effectively, stay aligned with our mission and strategy, and strengthen its impact within a tighter financial environment. The Board will consider some of the early findings in September.
48. We are establishing a clear pipeline and governance of prioritisation to ensure future digital investments are strategically targeted and benefits led and aligned with the latest government digital and data standards. Of our existing development work our EIP Data Management System is now live and being used by the Insights team responsible for our indicator work. The team are now turning their attention to post-live improvements. The CMS is largely working as intended, albeit with some issues we're trying to resolve. The implementation of our new finance system remains on track for August.
49. The Board will be updated on our broader approach to refresh our strategy in its August meeting.

Selected Stakeholder Engagement

50. Some key stakeholders in the establishment of the OEP are leaving Defra. David Hill, Director General of Strategy and Water, and formerly Director General Environment is to be Chief Executive of the Cambridge Growth Partnership. Edward Barker, our Senior Sponsor and Director Strategy, Governance and Climate, is leaving the civil service. Both have been enablers and supporters of the OEP in the group.
51. Outside of engagement reported above, the Chair, Chief Insights Officer and I met with Minister Muir on the 24 June. The meeting provided opportunity to discuss the Minister's current priorities. Just prior to the meeting he sent a letter (Annex E), setting out some of his Department's current activities around regulation and enforcement.
52. Since the Board's last meeting staff members have had important speaking engagements at: the Northern Ireland Environment Forum, the Wildlife Trust Big Gathering, the UKELA conference and the Chartered Institute of Waste Management Conference. I have spoken at the Land Use Conference, the Future Countryside Forum of the Countryside Alliance, the Association of Chief Executives Annual Conference.

Impact Assessments

Risk Assessment

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

54.

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 – Evidence to EAC inquiry into HM Treasury and the economics of climate and nature

Annex B – Submission in relation to post legislative scrutiny of EA21

Annex C - Chair's letter

Annex D – Response to Chair's letter

Annex E – Letter from Minister Muir

Annex F – Strategic Risk Register

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

Annex E and F have been redacted as publication would be prejudicial to the effective conduct of public affairs

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