

Board Paper**Date**

1 October 2025

Title

Report of the Chief Executive

Report by

Natalie Prosser, Chief Executive

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

1. Since the Board last met, a new Secretary of State, Emma Reynolds, has been appointed for Defra, as part of a reshuffle which has also include Steve Reed moving to MHCLG. New and refreshed priorities for Defra are understood to be growth, cleaning up our waters, the EU reset, reform of planning regulation, implementing the Corry review and progressing nature's recovery as well as backing British farming and supporting the food and drinks industry.
2. Our work progresses in this context, as we aim to situate our activity to make the most difference. The Board will consider the progress of our progress report in England and Northern Ireland, and this report sets out other ways our work programme is evolving in light of changes to Government's plans.
3. I also update on the culture review where I have now received a detailed report. The executive is progressing discussions on how we respond to the findings, and the programme of work we have to improve the OEP to achieve the organisational excellence our strategy intends.

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. The Board will separately consider our proposals for the scope and timetable of the Northern Ireland 2024/25 progress report, the key findings of the England EIP 2024/25 report, along with our proposed approach to handling the publication of the EIP25.
6. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*

Research and evidence

7. We are developing a medium-term (two to five year) research strategy to ensure the research needs of the organisation are met in a way that maximises the value gained from our research

and enables us to identify and be prepared to respond to opportunities to influence on major and impactful environmental issues. It will also be used to have dialogue and promote our research interests with external stakeholders such as our College of Experts and other Government bodies. We are developing agreement for the emerging issues where evidence is needed to support our work across our programmes and functions, in particular Insights, Intelligence and Legal Research. We aim that the Board will consider a draft strategy at its November strategy day alongside priorities for our thematic work and the annual horizon scanning report. The scale of our research activities will be considered, including by the Board, through our business planning.

8. We have received the final report from our contractors for the project to assess the achievability of Good Environmental Status in the marine environment, and this is now being considered as part of the marine evidence to date.

Better environmental law, better implemented

Advice, consultation responses and environmental law reports

9. Dame Glenys met with Minister Muir to discuss the Nutrient Action Programme in September. The Minister confirmed his intention that the announced Stakeholder Task & Finish Group will develop proposals that are practical for implementation at farm level, legally compliant, and achievable within a realistic timeframe. The group is expected to complete its work by February 2026, after which its proposals will be subject to a second public consultation for two months. We published and circulated to DAERA and the AERA Committee an [independent expert review of the NAP](#) we commissioned from the UK Centre for Ecology & Hydrology (UKCEH). The Minister welcomed this contribution.
10. Our environmental law report on the effective implementation of the existing regulations relating to the Nutrient Action Programme is progressing, with the aim to finalise for publication by March 2026 to ensure it can effectively inform the second consultation.
11. Our business plan for 2026/27 included a report on the implementation of environmental law relating to diffuse nutrient pollution from agriculture and its impacts on the water environment in England. Defra announced in Spring that it will reform the related regulations. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.* We have therefore paused our project after our evidence gathering phase and instead will follow development of the proposals and stand ready to give advice if appropriate. We will continue to actively consider how our contribution can be most influential.
12. This evidence gathered includes a review of the nutrient environmental standards for aquatic species. This shows that current standards use to protect rivers and estuaries in England and Northern Ireland are unlikely to be providing the coverage of protection needed for aquatic species. The contractors recommend and specify a revision of standards to better support environmental outcomes such as WFD objectives and EA21 species abundance targets.
13. We [responded to Defra's Consultation on Offshore Wind \(OFW\) Environmental Compensatory Measures Reforms](#), drawing on the range of evidence we have gathered through our marine programme. We welcomed the aim of the reforms, and the inclusion of a public register of compensation, adaptive management and the mitigation hierarchy. However we also highlighted risks associated with lack of a requirement to maintain Marine Protected Area network coherence, the impact on the ability to achieve targets, the additionality of compensatory measures, and need for clear guidance. We will continue to monitor the development of measures to support the expansion of offshore wind in a way that does not

come at the expense of an already depleted marine environment, and enables the urgent recovery required.

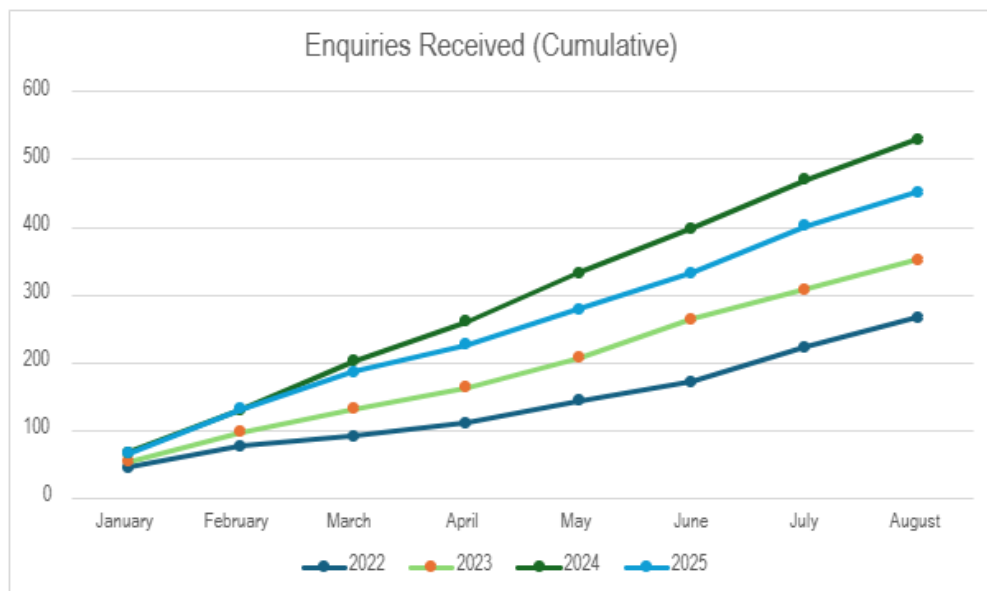
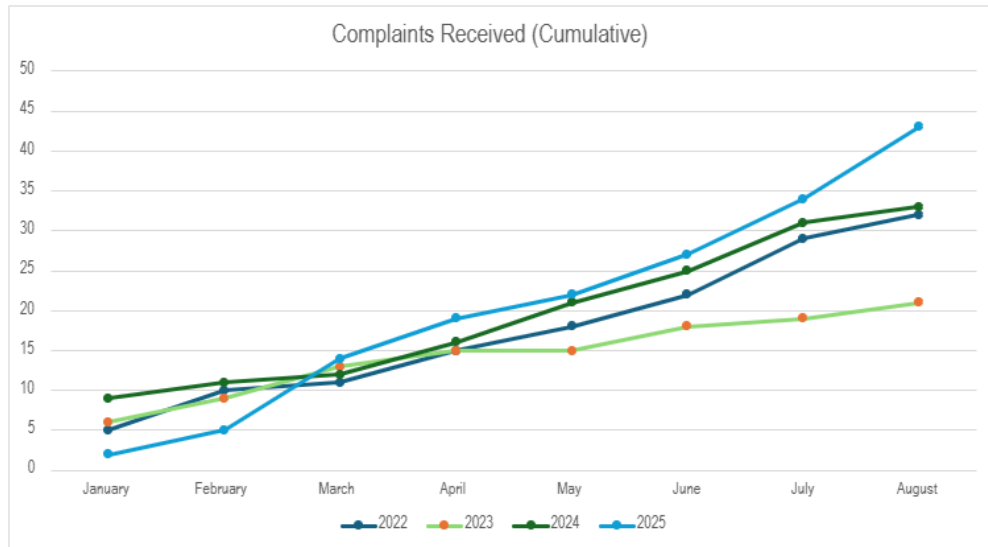
Other activities

14. We continue to monitor progress of the Planning and Infrastructure Bill, including amendments the Government is reported by the media to be considering at Lords' report stage in relation to duties in respect of national landscapes. We are engaging with officials to seek clarification, and with other stakeholders. Our interest will relate to the impact of any proposed changes to environmental protections and prospects for the environmental improvement intended by the EIP and targets.
15. We understand that the independent panel on environmental governance in Northern Ireland will submit its final report to the Minister imminently, and that it will then be presented to the NI executive in due course. We understand the report to have evolved since the interim report, but that the focus of the recommendations persists.
16. We continue to seek to engage constructively with Defra, Natural England and the Environment Agency in relation to the implementation of recommendations relating to the Corry review. We are not clear about Defra's detailed plans, but Defra has now offered us a teach-in session.

Improved compliance with environmental law

Complaints and enquiries

17. We have received eight new complaints, and 73 new enquiries since my last report. The volume of enquiries this year remains slightly below 2024, whereas the number of complaints is slightly above. We have 11 complaints open at the assessment stage and have closed three complaints, including one through early resolution of the issues raised.
18. In that case, we received a complaint in March 2025 regarding the Secretary of State's compliance with review, consultation and reporting obligations under the Nitrates Regulations and Farming Rules for Water. Our assessment concluded that the Secretary of State failed to comply with reporting requirements under Regulation 40, and 40A of the Nitrates Regulations, and Regulation 16 of the Farming Rules for Water. We also concluded there was an indication of a failure to comply with requirements to consult the public while reviewing the Nitrates Action Programme under Regulation 39(4) of the Nitrates Regulations. We engaged with Defra who agreed to publish outstanding reports by October 2025 and to review its consultation processes for the future. We have closed the complaint and will monitor compliance with these steps. We have published a case summary report on this matter on our website.



Progress of investigations

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

Organisational excellence and influence

Financial performance

19. The Board will consider the financial performance to the end of Q2, as well as delivery of the business plan in its next meeting. A verbal update on financial performance will be provided.

Future resourcing

20. We have submitted evidence (Annex A) to support Defra and DAERA consider our resources within the budget allocation process established to allow us to contribute to departmental business planning, in a way which protects our independence. We make a case for the resources a fully established OEP needs, and the contribution that will make to environmental protection in England and Northern Ireland. We also set out the impact of resourcing at 'flat cash', which we have been strongly led by officials to expect to be the likely outcome in England. The 'budget allocation board' will have taken place by the time the Board meets.
21. This process will set an indicative budget for the period to 2028/29 in England. The Secretary of State will be asked to consider whether to ring-fence the budget for this period, as had been committed by the previous Government. The duration and timing of any decision in respect of Northern Ireland resources is less clear.

Culture review

22. I have now received the report of the independent external review that I commissioned in light of the bullying and harassment responses to the People Survey, which had otherwise been so positive. I am grateful to the 25 staff who contributed to the review, providing a broad evidence base from which to draw its findings and recommendations. An anonymised version of the report is being prepared to share with all staff.
23. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*

Improving the OEP

24. The Improving the OEP Programme aims to close the highest priority gaps we have to the organisational excellence we aspire to in our strategy. Whilst progress has been slower than hoped, as more immediate priorities have crowded out the capacity of those leading its workstreams, our planned work is beginning to yield its intended outputs.
25. We have launched a clearly defined role description for the staff who lead the teams and work which supports most of the outcomes we achieve. We've clarified how that role is supported and empowered by the Executive Directors in their different leadership roles. Workshops in October, followed by one to one discussions aim to allow us to explore collectively, and then specifically for each project, how we can set project leaders up to succeed. A capability programme – informed by a survey of all those involved – will follow and those acting as project lead will have a common performance objective. This is a core part of our work to **improve our project management**, along with refinements to how we initiate projects, identify and learn lessons and a refresh of the tools available to support efficient project management.
26. Our **efficiency** project has begun with pilots in each of the four levers for efficiency – technology, process, culture and purchasing. For example, we are piloting how we apply lean process improvement techniques, along with the use of Microsoft's automation tools, to streamline our processes – with a second pilot due to conclude in autumn. We'll shortly review our processes for decision making, seeking efficiency opportunities. We are developing good practice for assessments of the productivity benefits from technology investment, so it can inform future resource allocation, and progressing improvements through CoPilot adoption, and work on our complaints and data management systems. Most of our efficiency gains available to us are likely to be cultural. The project lead role described above, and the response to a 'perfectionist' culture described by the culture review are likely to be key opportunities.
27. We employed consultants to produce a draft updated **People Strategy** responding to the internal audit report and the results of our latest people survey. While the consultants made

OFFICIAL

useful progress, significant further work is required to turn their draft into one that uses language that our staff will find engaging, and to prioritise the actions proposed to a manageable number, while responding to the culture review's findings. This will be accompanied by an updated People Survey Action Plan. We are already doing many of the right things, but all can be improved in response to the feedback received via the People Survey and consequent culture review.

28. We have recruited an additional specialist post within the communications team to support improvements to our **stakeholder engagement**, pending final checks. The successful candidate is an experienced stakeholder engagement professional with extensive experience in the environment sector, notably on marine issues. Their initial focus will be on reviewing and updating our current plan and approach, including our resources, materials and processes. Ongoing, they will provide enhanced support to our project teams and leadership team to ensure effective engagement to secure impact and influence.
29. We are taking stock of the **implementation of our strategy** ahead of the Board's strategy day in November. We have planned a small number of specific interventions which intent to test and encourage alignment of our work to our intended approach. These focus on how effectively we are operating the 'issue-based working' our strategy intends, work on our values and making them real for different people in different teams, and work to draw lessons from the 'theories of impact' which underpin our prioritisation, to create simpler tools for future projects to use to work through how we expect to make the most difference.

Corporate and Enabling Services

30. The audit of our annual report and accounts is progressing. There are no material issues yet raised.
31. As the Board agreed in July, we have now signed a new contract with Boxxe, our outsourced IT service provider.

Selected Stakeholder Engagement

32. We wrote to the Defra Secretary of State, Defra Minister of State and the Secretary of State for Communities, Housing, and Local Government on their appointments after the reshuffle. We await first meeting with the new Secretary of State, given conference recess.
33. I attended the first Wild Summit event, which brought together policy experts, campaigners, officials and politicians for a conference focused on the critical importance of investing in nature. I took part in a panel discussion on improving water quality and was able to highlight the work of the OEP in this area and signal our key messages around future reform. A number of other OEP staff attended the event to benefit from excellent networking opportunities.

Board and other recruitment

34. The advertisement for the OEP Chair must be reviewed by the new Secretary of State before being issued – a further delay is likely. Other new recruits are:
35. *This section has been redacted as it includes personal data.*

Impact Assessments

Risk Assessment

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

Equality Analysis

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

Environmental Analysis

37. 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

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