

3 August 2012

Friends of the Earth Scotland response to the Scottish Environment Protection Agency and Scottish Government consultation on Proposals for an Integrated Framework of Environmental Regulation

About Friends of the Earth Scotland

Friends of the Earth Scotland is an independent Scottish charity with a network of thousands of supporters, and active local groups across Scotland. We are part of Friends of the Earth International, the largest grassroots environmental network in the world, uniting over 2 million supporters, 77 national member groups, and some 5,000 local activist groups - covering every continent. We campaign for environmental justice: no less than a decent environment for all; no more than a fair share of the Earth's resources.

Introduction

Friends of the Earth Scotland welcome the opportunity to respond to this consultation. We note that we have signed up to and support the full response submitted by Scottish Environment LINK. We have no detail to add to the response submitted by LINK as to specific consultation questions, but wish to add to some general comments.

Comments

We are concerned with the focus of Section 2, which strongly implies that the main purpose of the proposals is to ensure continued economic growth. We reiterate our comments made as part of a broad coalition of civil society groups in response to the Government's National Performance Framework that economic growth is one of many means to the goal of flourishing, and not an end in itself, therefore should not form part of the Government's single Purpose.

Our long term wellbeing and prosperity is most definitely underpinned by a broad range of factors including very importantly a healthy and safe environment. However, on a finite planet in a resource and carbon constrained world, it is both a strategic priority and moral duty to ensure that Scotland does not exceed its fair share of the earth's ecological resources, particularly given the historical ecological debt we owe.

The focus and purpose of the proposed regulatory reform should recognise these constraints, and include an emphasis on both intra and inter generational environmental justice. The UNECE Aarhus Convention, to which both the EU and the UK are signatories, enshrines a duty to "protect and improve the environment for the benefit of the present and future generations".¹

As an effective, independent regulator, and respected authority on the environment, SEPA's priority should remain the protection and improvement of the environment. While SEPA may have to take account of economic policy, the pursuit of economic growth must not override environmental protection and improvement.

Contact

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¹ Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters, preamble

ANNEX C - CONSULTATION ON PROPOSALS FOR AN INTEGRATED FRAMEWORK OF ENVIRONMENTAL REGULATION



RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

Friends of the Earth Scotland

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

Church

Forename

Mary

2. Postal Address

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3. Permissions - I am responding as...

Individual

/ Group/Organisation

Please tick as appropriate

- (a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

- (b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

- (c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

- (d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes