

Environmental Protection Bill Principles Consultation

PUBLIC CONSULTATION RESULTS
ENVIRONMENTAL PROTECTION UNIT

Version Control

1	Environmental Protection Unit	26/08/2025	DRAFT
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Environmental Protection Bill

<https://consult.gov.im/environment-food-and-agriculture/environmental-protection-bill>

This report was created on Friday 08 August 2025 at 10:49

The activity ran from 12/06/2025 to 07/08/2025

Responses to this survey: **138**

Executive Summary

The public consultation for the principles of the Environmental Protection Bill 2025 ran from June to August for 8 weeks. There were 138 responses, of which 83% were in agreeance with the principles (both *strongly agree* and *agree*), whilst only 6% disagreed (both *strongly disagreed* and *disagreed*) (Figure 1).

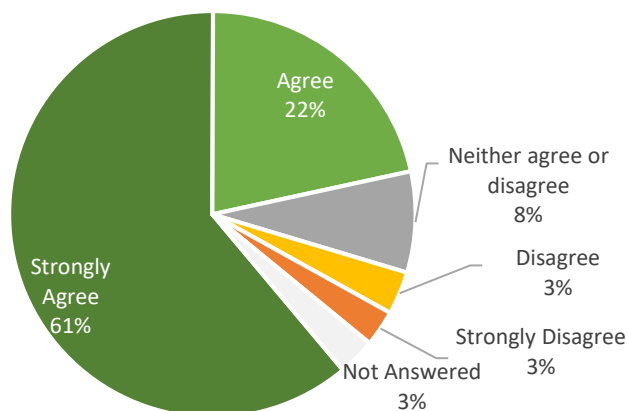


Figure 1 Total Responses to Environmental Protection Bill public consultation.

In general, below 5% of respondents disagreed to any individual question. However, over 10% (but below 20%) of respondents disagreed with principles about using UK regulations as our framework, aligning with UK hazardous waste regulations and developing reuse and recycling targets in line with climate change objectives and the waste strategy. The overall understanding is that it is felt that UK environmental standards have not been that effective and the island would be better positioned to adopt best practice from other surrounding jurisdictions.

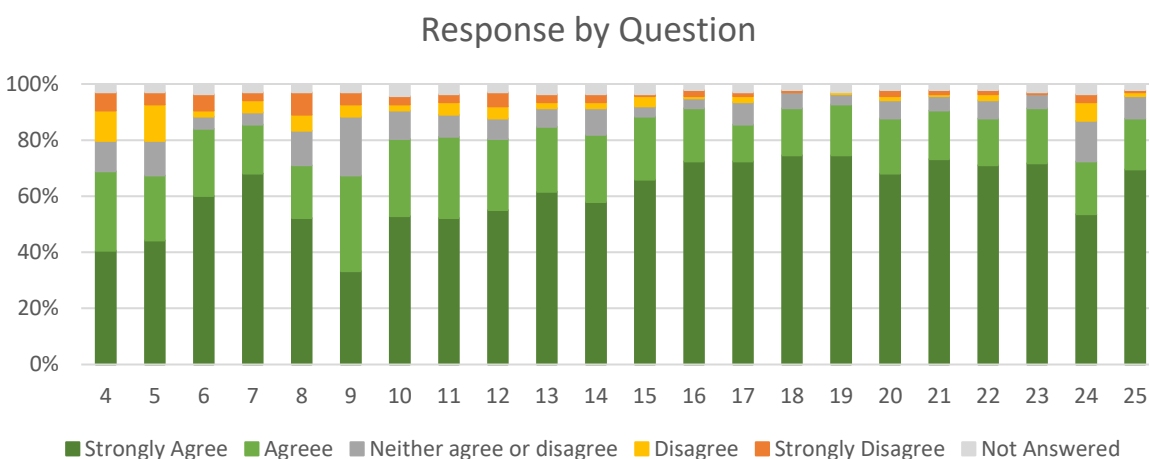


Figure 2 Response by Question

We Asked	The purpose of the consultation by the Department of Environment, Food and Agriculture was to seek stakeholder and public views on new environmental protection principles for the island, including those for offshore developments and the vires intended to be included in the Environmental Protection Bill. The consultation ran from 12/06/2025 to 07/08/2025.
You Said	There were 136 responses via the consultation Hub. In addition, there were two further responses from the Department of Public Health and Manx National Farmers Union. These responses have been collated into a single consultation response document, available on the Consultation Hub webpage.
We Did	The Department of Environment, Food and Agriculture are grateful to all those who took the time to share their views. Your input has been used to improve the legislative bill and will play a key role in shaping the next steps.

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Introduction

This document presents a summary and analysis of responses received during the public consultation on the proposed Environmental Protection Bill principles. The consultation, conducted by the Department of Environment, Food and Agriculture (DEFA), closed on 7th August 2025, and invited feedback from stakeholders, industry representatives, and members of the public on the scope, objectives, and proposed regulatory framework of the Bill.

The Environmental Protection Bill aims to modernise the Isle of Man's environmental legislation, aligning it with international standards and UK best practices where appropriate. It addresses key areas including industrial emissions, waste management, offshore wind development, water pollution control, and the implementation of the Polluter Pays Principle.

This review reflects the views submitted through the consultation process and highlights areas of consensus, concern, and recommendations for refinement. The feedback received will inform the next stages of legislative development, ensuring that the final Bill is both proportionate and effective in safeguarding the Island's environment for current and future generations.

Responses

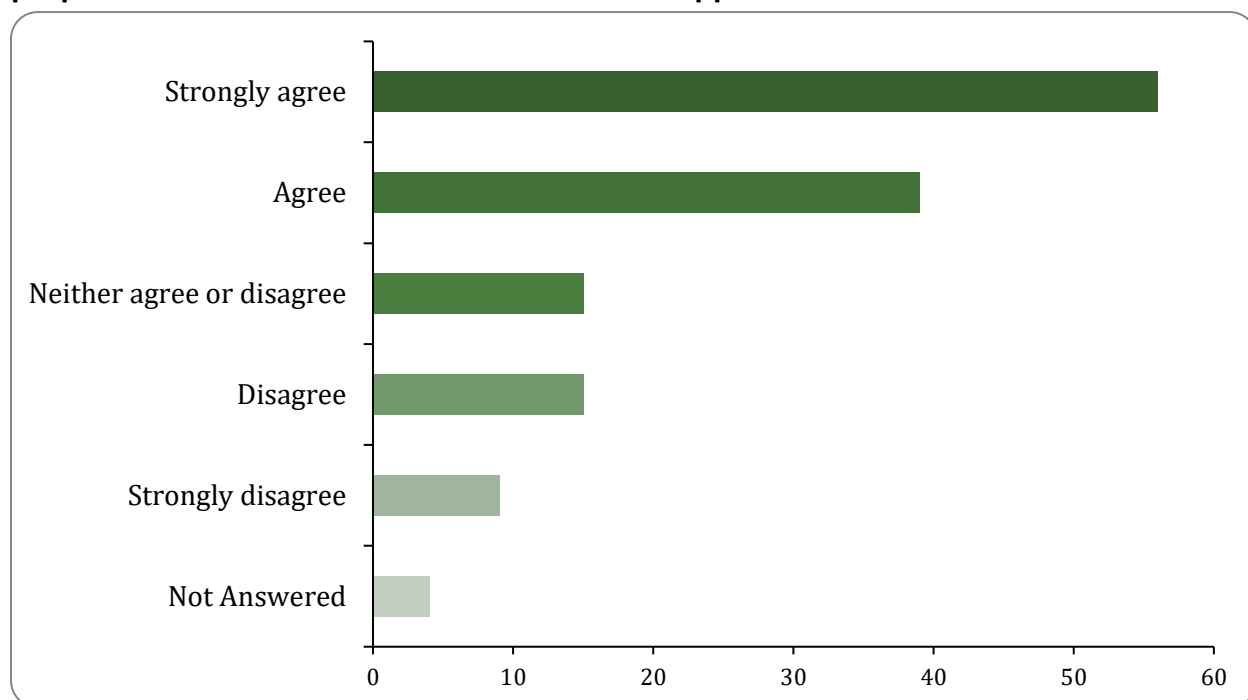
Which option best describes your interest in responding to this consultation?

Option	Total	Percent
Member of public	115	83%
Isle of Man Government	3	2%
Business owner or Stakeholder	12	9%
Member of Tynwald	0	0%
Other (please specify)	7	5%
Not Answered	1	1%

Please note that Public Health and the Manx National Farmers Union (MNFU) submitted their answers separately, and the response has been included as an appendix.

Questions

4: Do you agree that the Isle of Man should align with the UK regulatory position for environmental protection associated with industrial operations, where it is proportionate and reasonable to take such an approach?



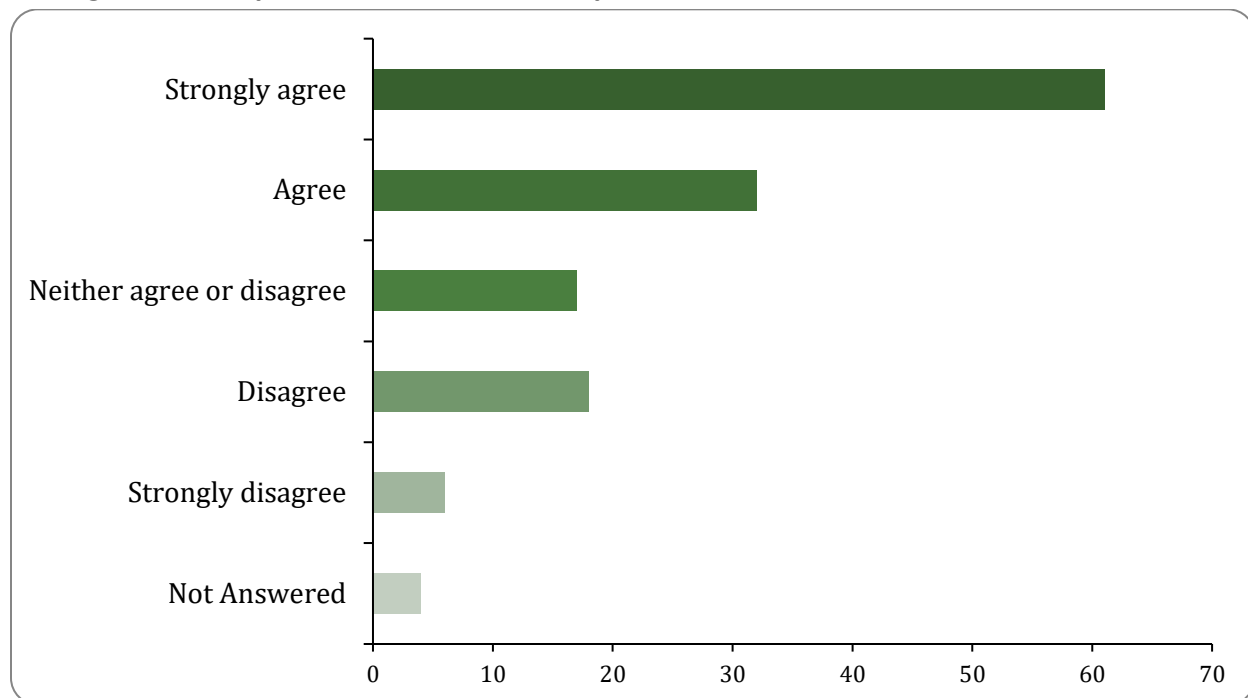
Option	Total	Percent
Strongly agree	56	41%
Agree	39	28%
Neither agree or disagree	15	11%
Disagree	15	11%
Strongly disagree	9	7%
Not Answered	4	3%
Total	134	

Conclusion:

The desire to regulate industrial operations to UK standards for environmental protection was agreed with by ~69% of respondents, whilst ~18% disagreed. Within the comments, the disagreement appears to be in relation to the use of UK regulations instead of higher international standards.

The majority of respondents agreed with this principle.

5: Do you agree that regulation of waste and hazardous wastes are best aligned with UK legislation to provide environmental protection and meet international standards?



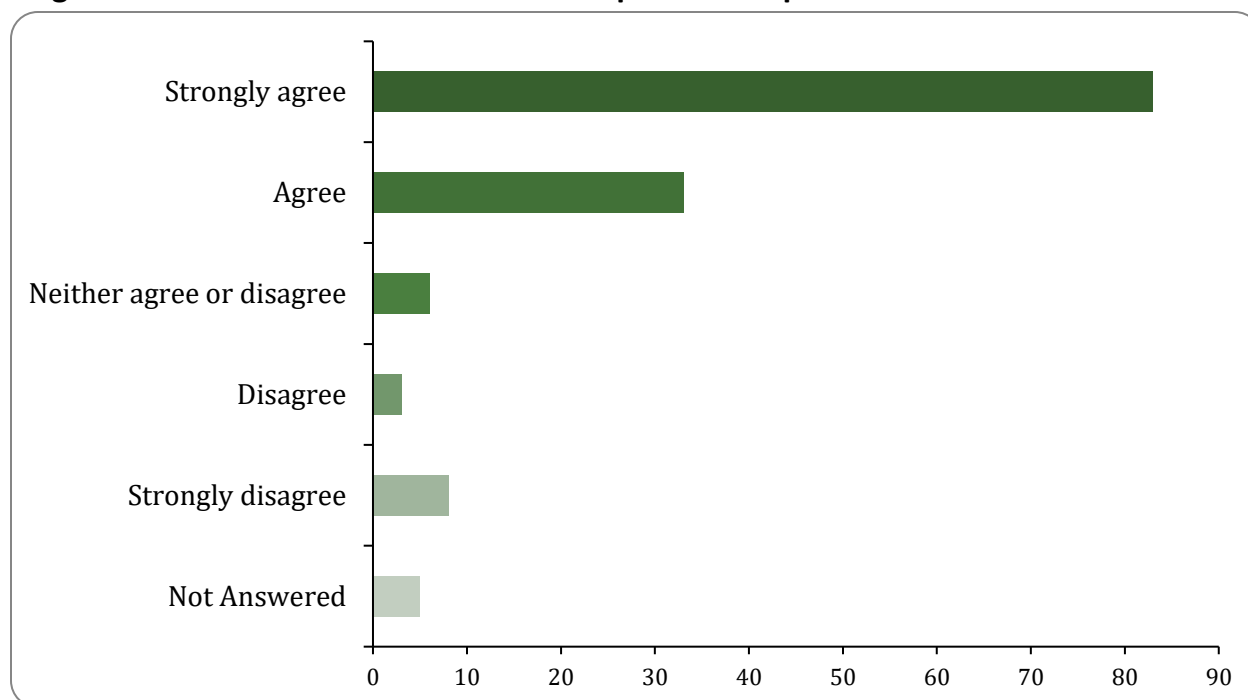
Option	Total	Percent
Strongly agree	61	44%
Agree	32	23%
Neither agree or disagree	17	12%
Disagree	18	13%
Strongly disagree	6	4%
Not Answered	4	3%
Total	134	

Conclusion:

The regulation of waste and hazardous wastes are best aligned with UK legislation to provide environmental protection and meet international standards was agreed by ~67% of respondents, whilst ~17% disagreed. Overall, those who disagreed suggested that UK legislation may not meet international standards, and in some cases the Isle of Man should strive to surpass international standards.

The majority of respondents agreed with this principle.

6: Do you agree that measures should be developed to improve reuse and recycling in line with the waste hierarchy and waste disposal efficiencies, including environmental targets for waste minimisation and waste prevention plans?



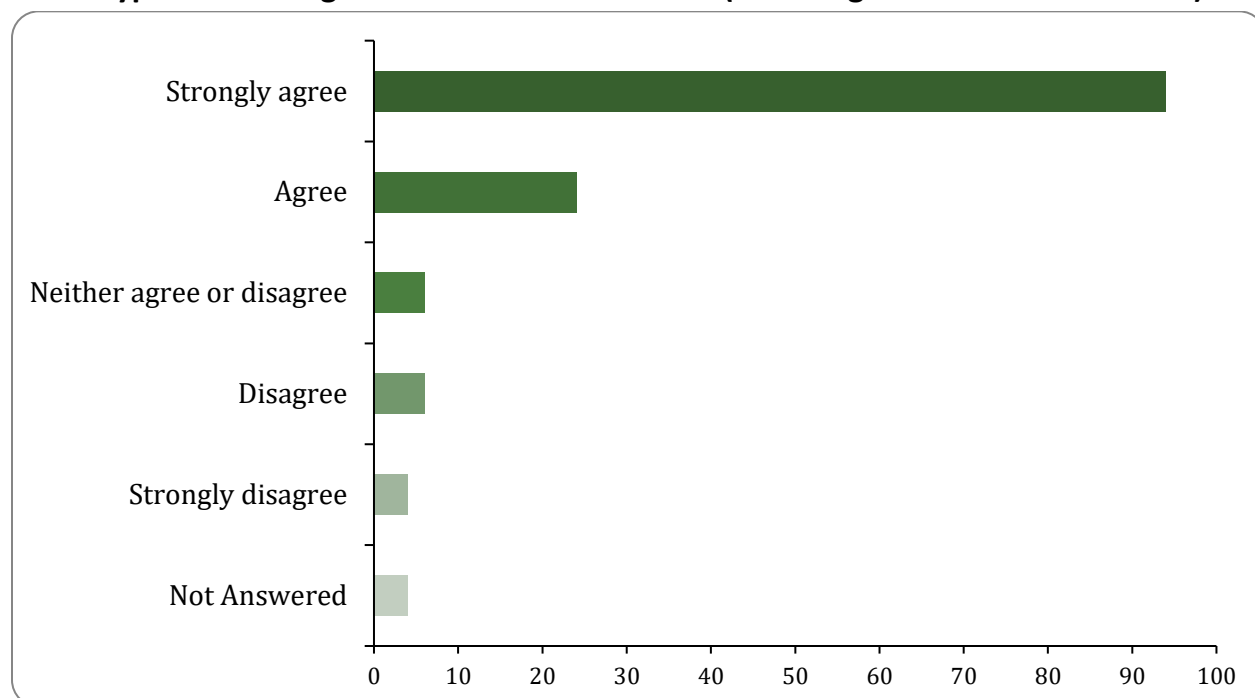
Option	Total	Percent
Strongly agree	83	60%
Agree	33	24%
Neither agree or disagree	6	4%
Disagree	3	2%
Strongly disagree	8	6%
Not Answered	5	4%
Total	132	

Conclusion:

The regulatory use of the waste hierarchy to improve recycling and reuse was agreed with by ~84% of respondents, whilst ~8% disagreed.

The majority of respondents agreed with this principle.

7: Do you agree that the Island should produce a waste strategy and management plan for all types of waste generated across the island (including for offshore industries)?



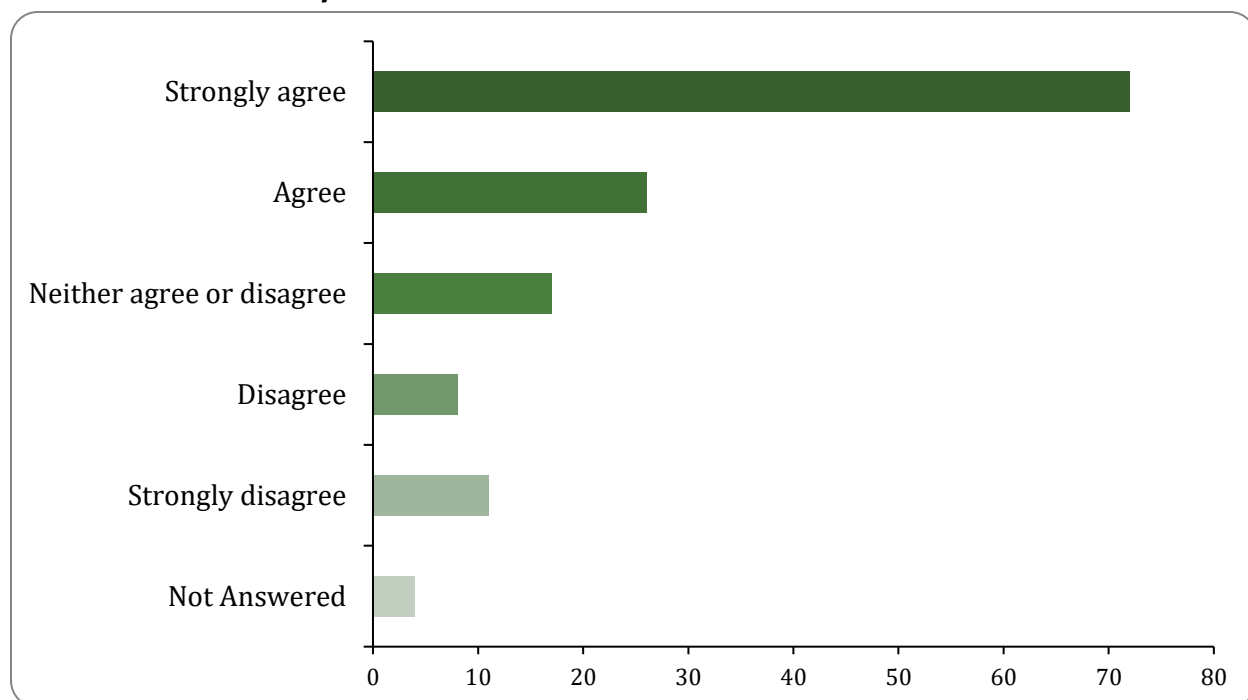
Option	Total	Percent
Strongly agree	94	68%
Agree	24	17%
Neither agree or disagree	6	4%
Disagree	6	4%
Strongly disagree	4	3%
Not Answered	4	3%
Total	134	

Conclusion:

The development of an island waste strategy and management plan was agreed with by ~85% of respondents, whilst ~7% disagreed.

The majority of respondents agreed with this principle.

8: Do you agree that the government should develop re-use and recycling targets for waste reduction to align with the Climate Change Plan and Waste Strategy via adoption of the waste hierarchy?



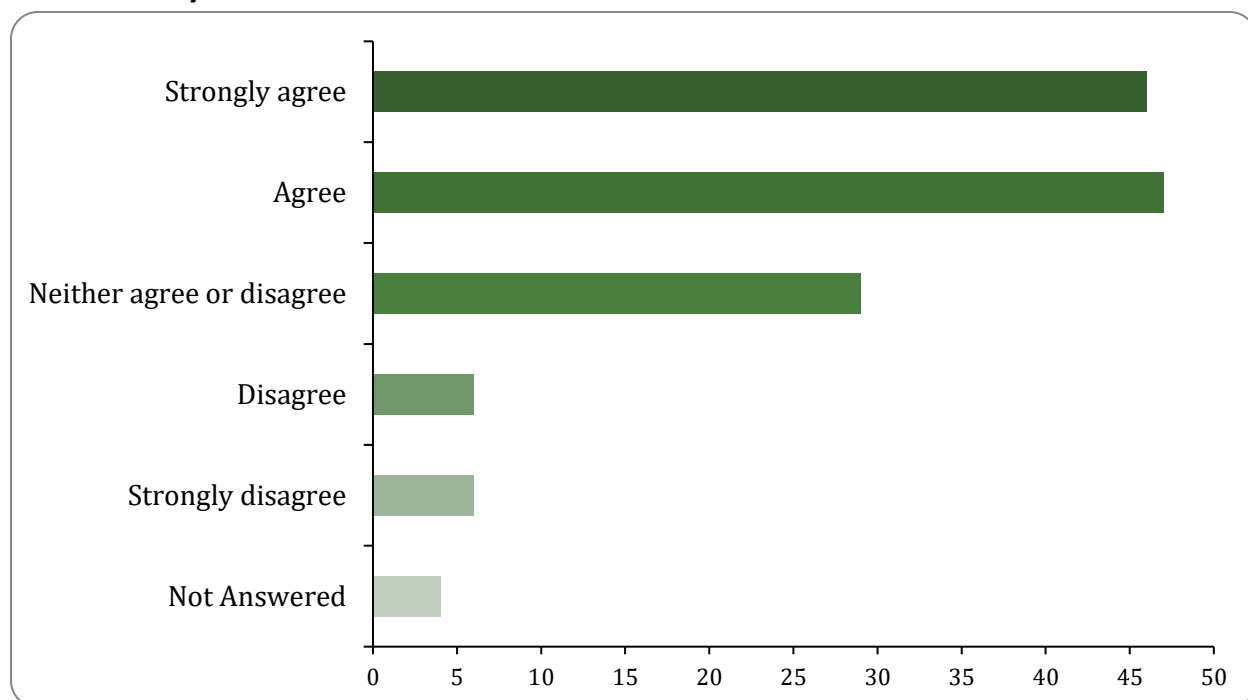
Option	Total	Percent
Strongly agree	72	52%
Agree	26	19%
Neither agree or disagree	17	12%
Disagree	8	6%
Strongly disagree	11	8%
Not Answered	4	3%
Total	134	

Conclusion:

The development of re-use and recycling targets for waste reduction to align with the Climate Change Plan and Waste Strategy via adoption of the waste hierarchy was agreed with by 71% of respondents, whilst 14% disagreed.

The majority of respondents agreed with this principle.

9: Do you agree that definitions and standards should be developed to allow for some wastes to be defined as by-products or end of waste to encourage resource sustainability and minimise waste?



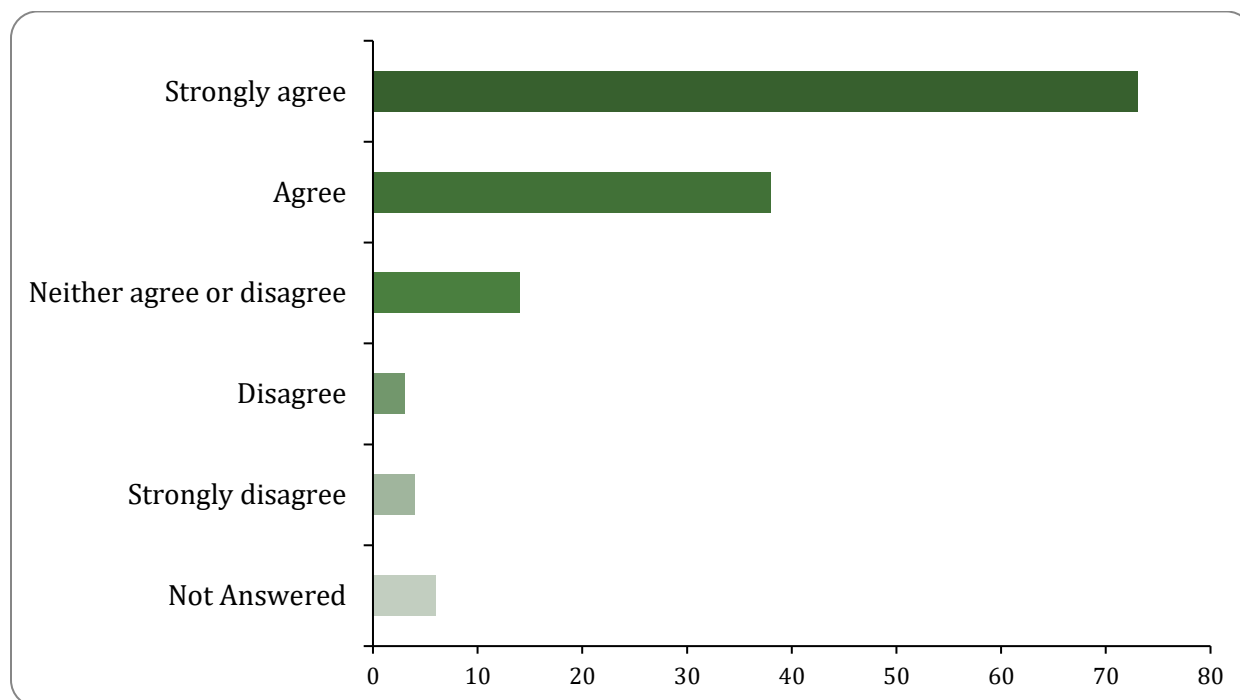
Option	Total	Percent
Strongly agree	46	33%
Agree	47	34%
Neither agree or disagree	29	21%
Disagree	6	4%
Strongly disagree	6	4%
Not Answered	4	3%
Total	134	

Conclusion:

The regulation of repurposed wastes to optimise quality secondary resources and prevent waste crime was agreed with by ~67% of respondents, whilst ~8% disagreed. Around 20% of respondents did not agree nor disagree.

The majority of respondents agreed with this principle.

10: Do you agree that landfills should be designed, constructed and managed in accordance with the type of waste they receive? Any new landfill shall not be a dilute and disperse landfill site.



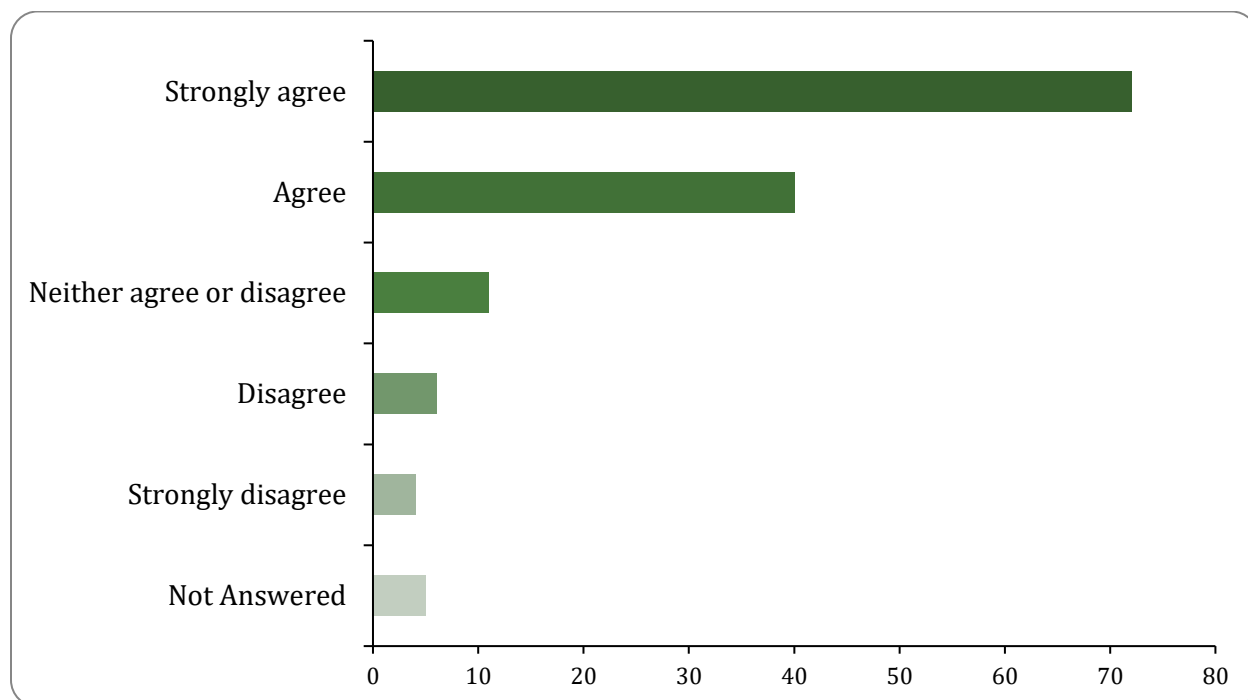
Option	Total	Percent
Strongly agree	73	53%
Agree	38	28%
Neither agree or disagree	14	10%
Disagree	3	2%
Strongly disagree	4	3%
Not Answered	6	4%
Total	132	

Conclusion:

The cease of dilute and disperse landfills, and the design of new landfills to environmentally manage the types of waste it received was agreed with by ~81% of respondents, whilst ~5% disagreed.

The majority of respondents agreed with this principle.

11: Do you agree that waste acceptance criteria should be implemented to identify a standard for which wastes should be treated or deposited in landfills to maximise resource protection and minimise environmental hazards?



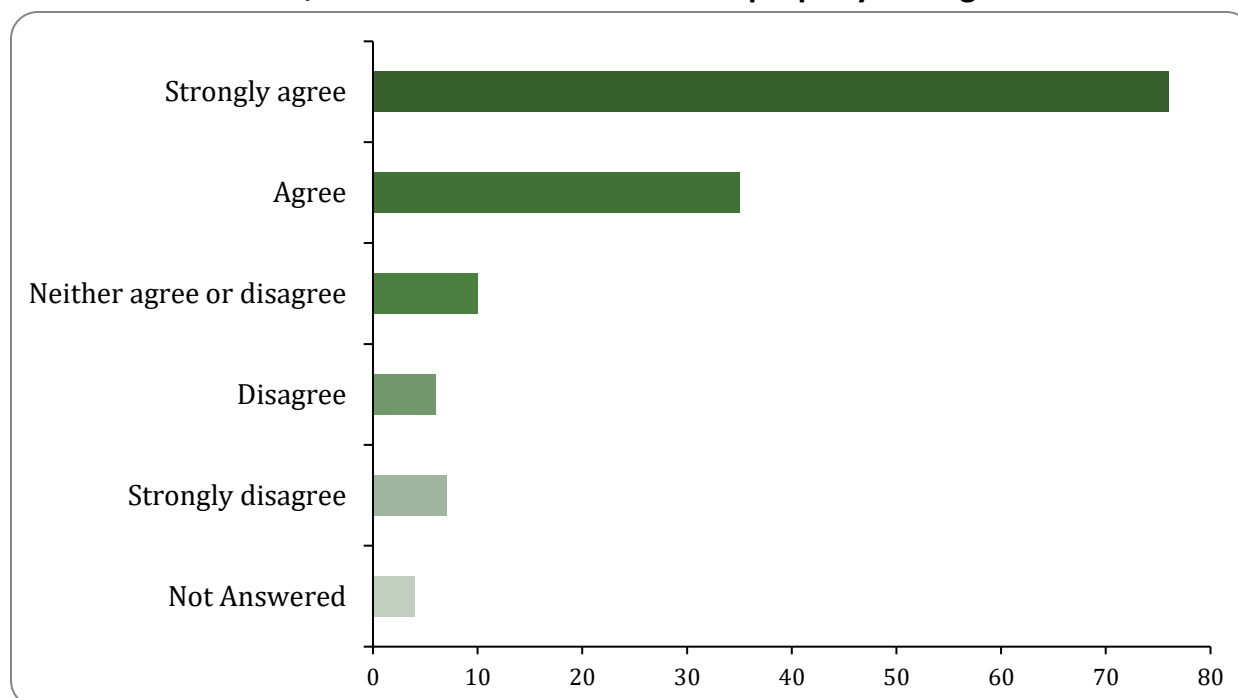
Option	Total	Percent
Strongly agree	72	52%
Agree	40	29%
Neither agree or disagree	11	8%
Disagree	6	4%
Strongly disagree	4	3%
Not Answered	5	4%
Total	133	

Conclusion:

The use of waste acceptance criteria to assess a wastes suitability for landfill should be used to protect the landfill resource, encourage recycling and was agreed with by ~81% of respondents, whilst ~7% disagreed.

The majority of respondents agreed with this principle.

12: Do you agree that agricultural waste should be managed under the same regulatory framework as all other wastes including industrial, commercial and household waste, when it is hazardous, mixed with other waste or improperly managed?



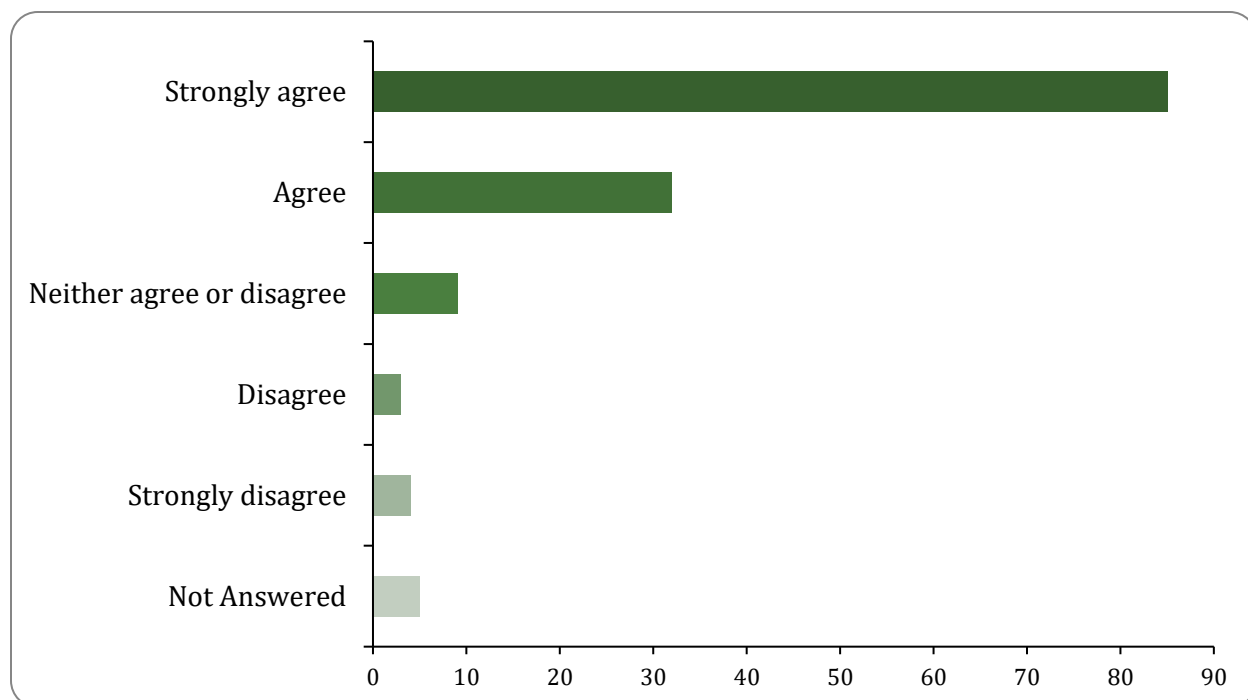
Option	Total	Percent
Strongly agree	76	55%
Agree	35	25%
Neither agree or disagree	10	7%
Disagree	6	4%
Strongly disagree	7	5%
Not Answered	4	3%
Total	134	

Conclusion:

The inclusion of agricultural waste as a controlled waste for environmental protection regulatory purposes was agreed with by ~80% of respondents, whilst ~9% disagreed.

The majority of respondents agreed with this principle.

13: Do you agree that provisions should be put in place for regulators to take action to prevent or mitigate pollution through project design and operational permits for industrial installations onshore and offshore?



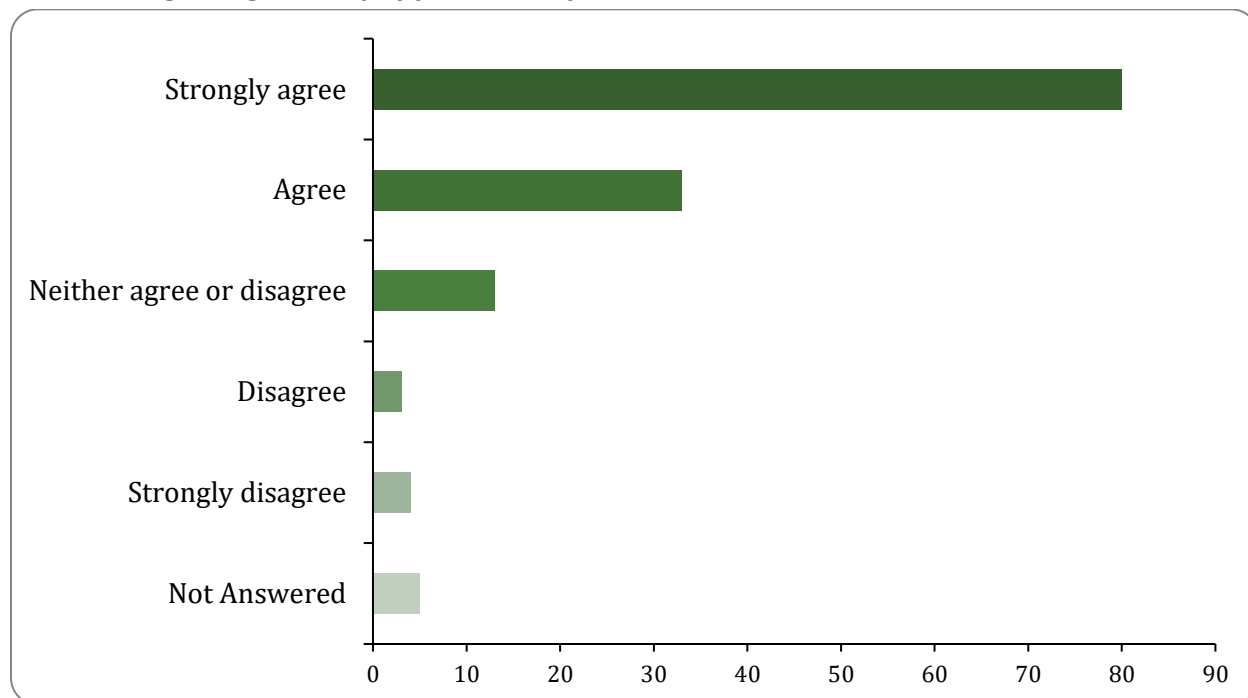
Option	Total	Percent
Strongly agree	85	62%
Agree	32	23%
Neither agree or disagree	9	7%
Disagree	3	2%
Strongly disagree	4	3%
Not Answered	5	4%
Total	133	

Conclusion:

The use of operational permits to regulate emissions and to prevent pollution should be used by the Department for industry regulation was agreed with by ~85% of respondents, whilst ~5% disagreed.

The majority of respondents agreed with this principle.

14: Do you agree that industrial operations should employ best available technologies when being designed, equipped, and operated to minimise emissions?



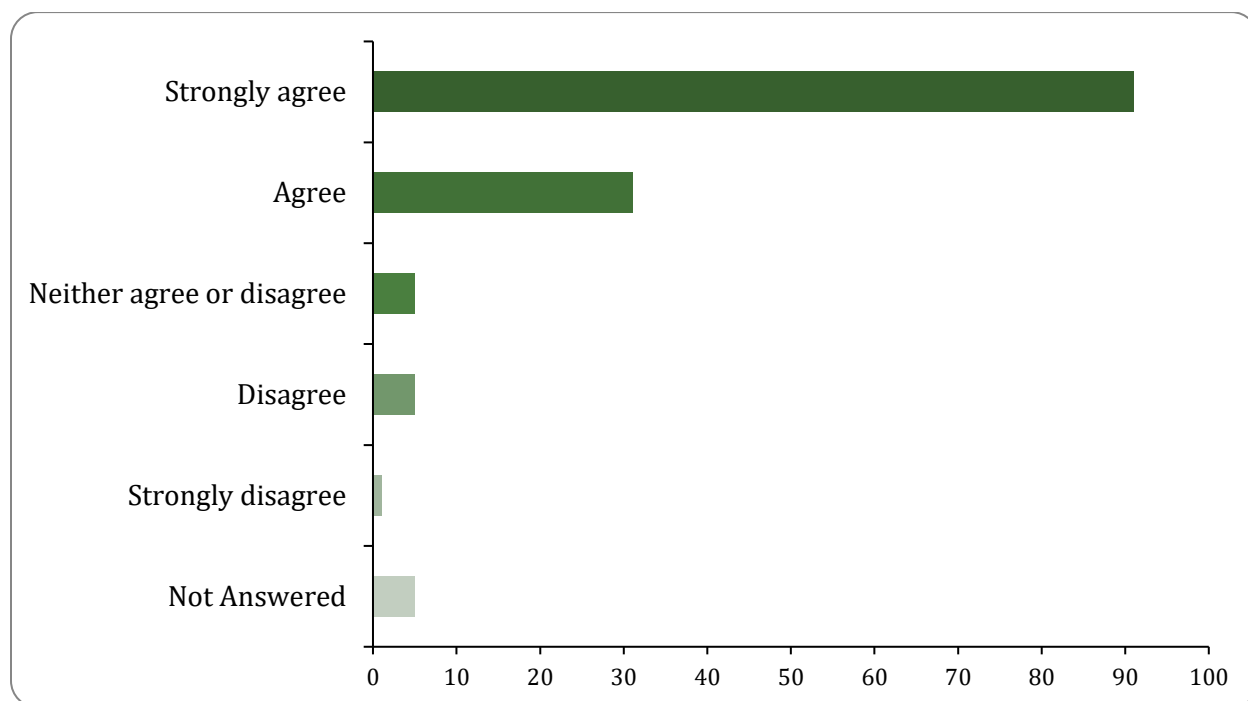
Option	Total	Percent
Strongly agree	80	58%
Agree	33	24%
Neither agree or disagree	13	9%
Disagree	3	2%
Strongly disagree	4	3%
Not Answered	5	4%
Total	133	

Conclusion:

The use of best available technologies by companies on island to mitigate pollution, emissions and discharges was agreed with by 82% of respondents, whilst 5% disagreed.

The majority of respondents agreed with this principle.

15: Do you agree that unplanned discharges or emissions can cause severe environmental damage and regulations are required to ensure that companies implement robust safety measures to prevent incidents, and emergency response protocols to manage such incidents?



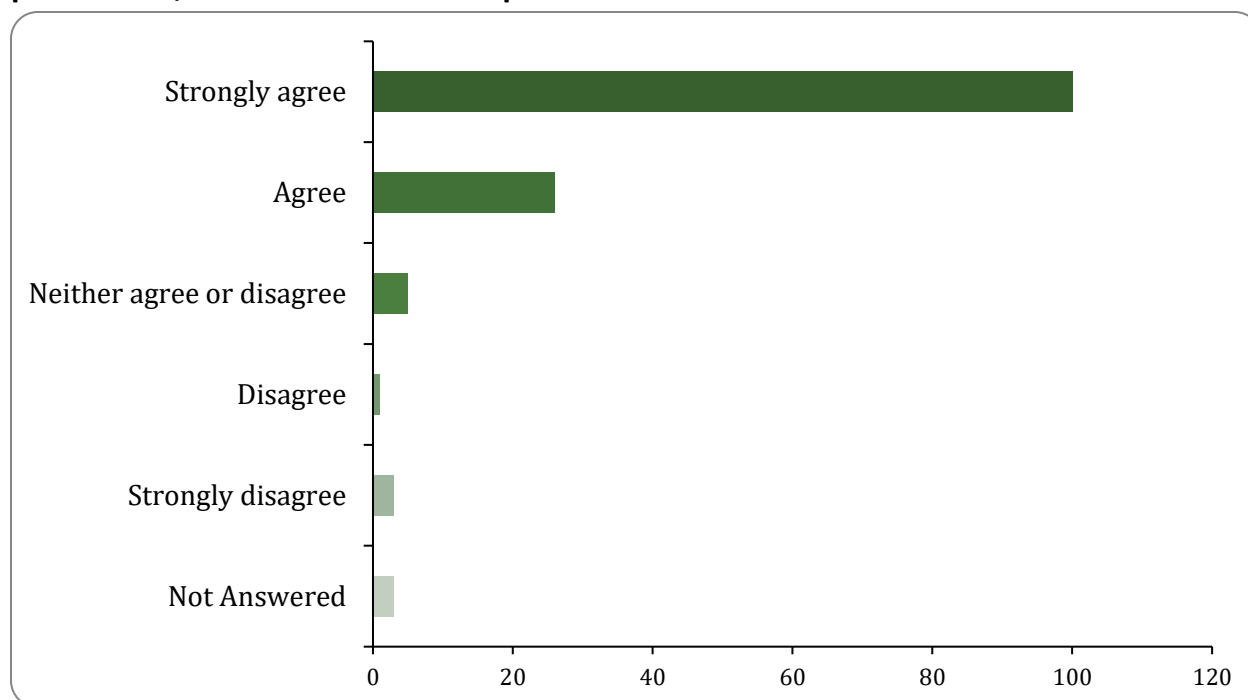
Option	Total	Percent
Strongly agree	91	66%
Agree	31	22%
Neither agree or disagree	5	4%
Disagree	5	4%
Strongly disagree	1	1%
Not Answered	5	4%
Total	133	

Conclusion:

Implementation of safety measures by companies operating on offshore installations should be regulated was agreed with by 88% of respondents, whilst 5% disagreed.

The majority of respondents agreed with this principle.

16: Do you agree that regulation controls should be developed for the use and discharge of chemicals in offshore installations, requiring operators to assess the toxicity, persistence, and bioaccumulation potential of chemicals before use?



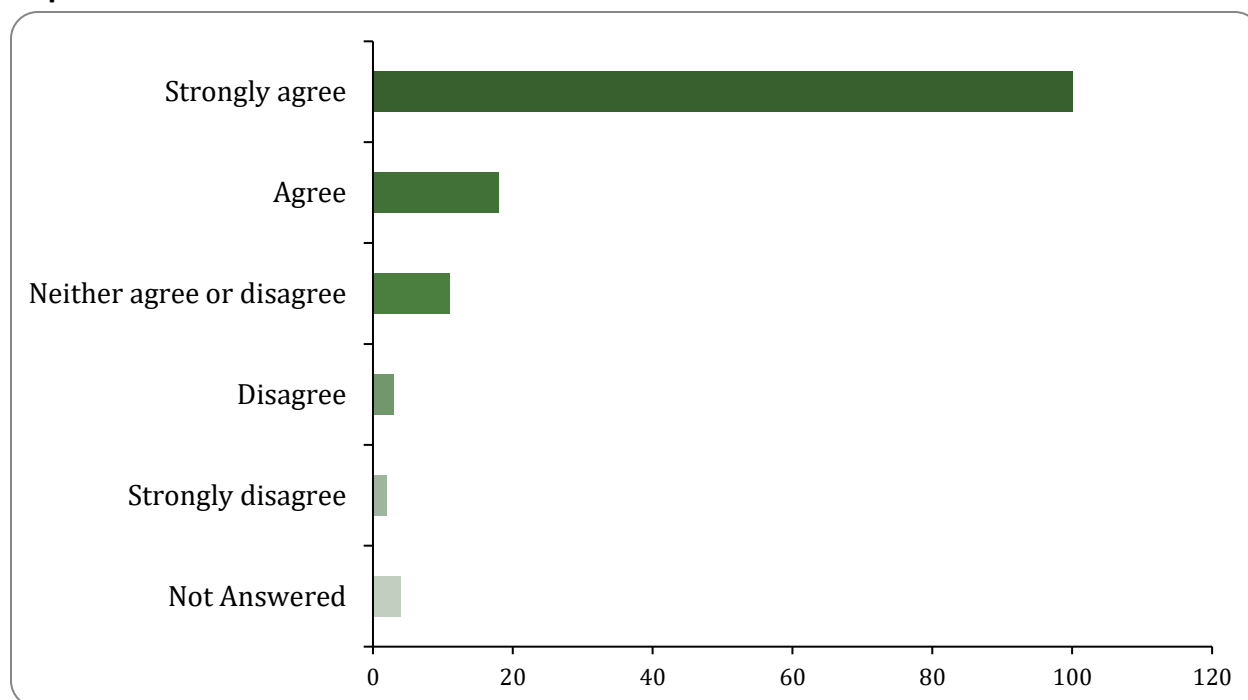
Option	Total	Percent
Strongly agree	100	72%
Agree	26	19%
Neither agree or disagree	5	4%
Disagree	1	1%
Strongly disagree	3	2%
Not Answered	3	2%
Total	135	

Conclusion:

The use of permits for applying to discharge chemicals from offshore installations and their development, maintenance and decommissioning was agreed with by 91% of respondents, whilst 3% disagreed.

The majority of respondents agreed with this principle.

17: Do you agree that offshore developments must demonstrate adherence to ecological standards to minimize habitat disruption and other adverse environmental impacts?



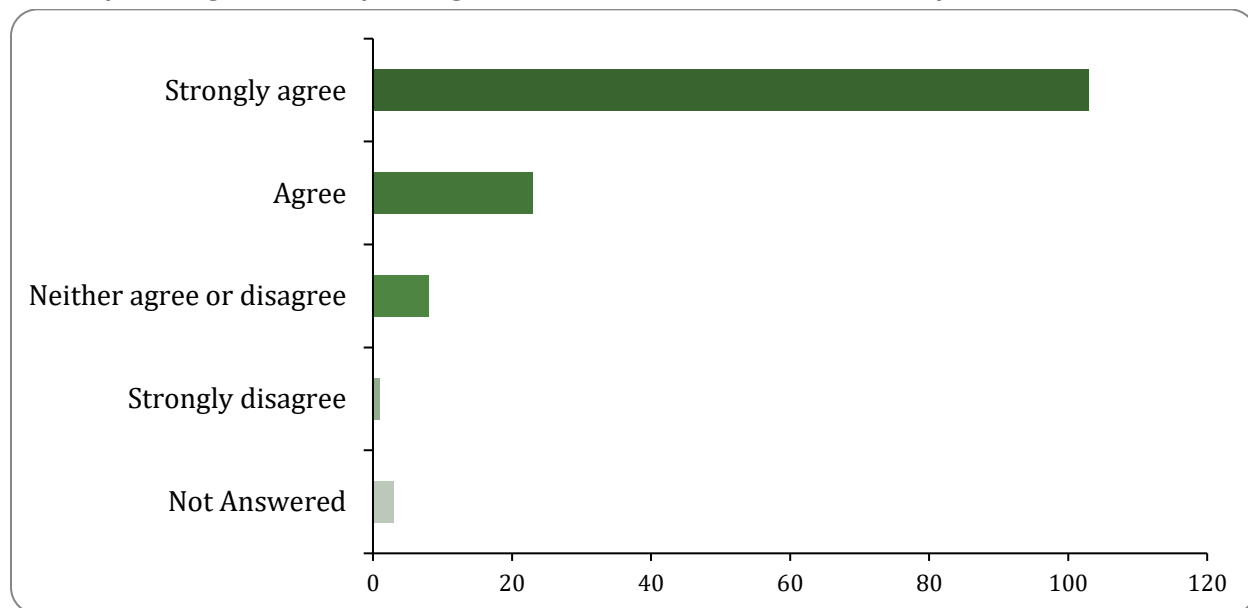
Option	Total	Percent
Strongly agree	100	72%
Agree	18	13%
Neither agree or disagree	11	8%
Disagree	3	2%
Strongly disagree	2	1%
Not Answered	4	3%
Total	134	

Conclusion:

The demonstration that offshore developments must adhere to ecological standards to minimize disruption and other adverse environmental impacts was agreed with by 85% of respondents, whilst 3% disagreed.

The majority of respondents agreed with this principle.

18: Do you agree that emergency plans should be developed setting out arrangements for responding to and reporting on incidents which cause, or may cause harm?



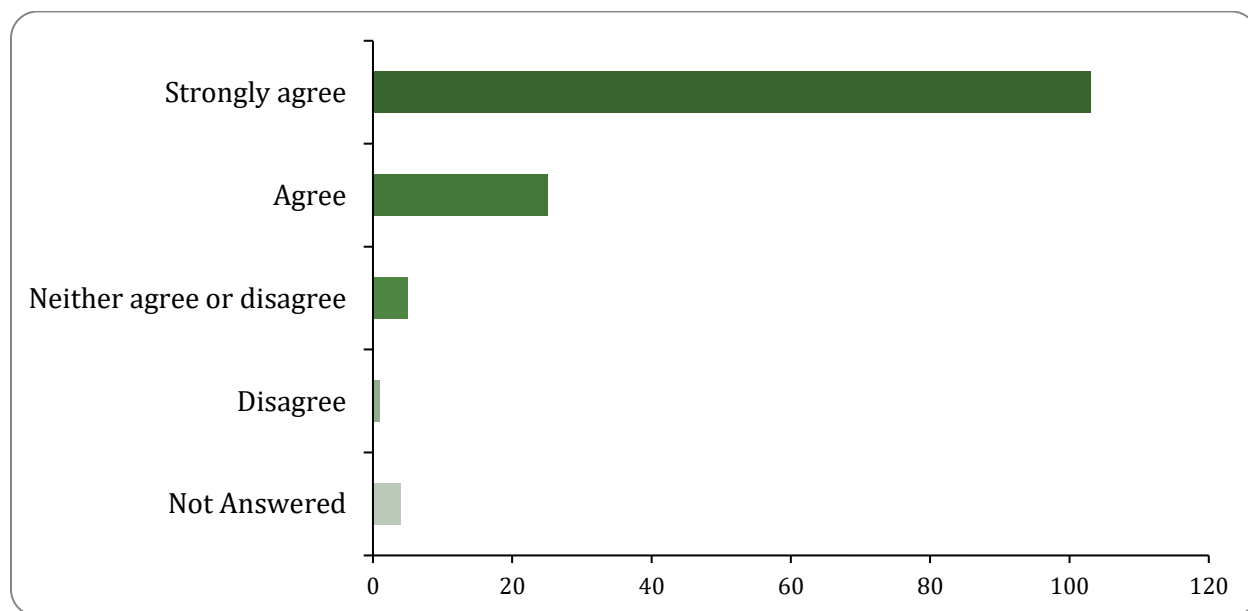
Option	Total	Percent
Strongly agree	103	75%
Agree	23	17%
Neither agree or disagree	8	6%
Disagree	0	0%
Strongly disagree	1	1%
Not Answered	3	2%
Total	135	

Conclusion:

The principle that emergency plans for responding to accidents should be developed from the outset of the project was agreed to by 92% of respondents, with only 1% disagreeing.

The majority of respondents agreed with this principle.

19: Do you agree that decommissioning of installations should be planned from the beginning to allow sustainable end of life waste disposal and the environment to be restored?



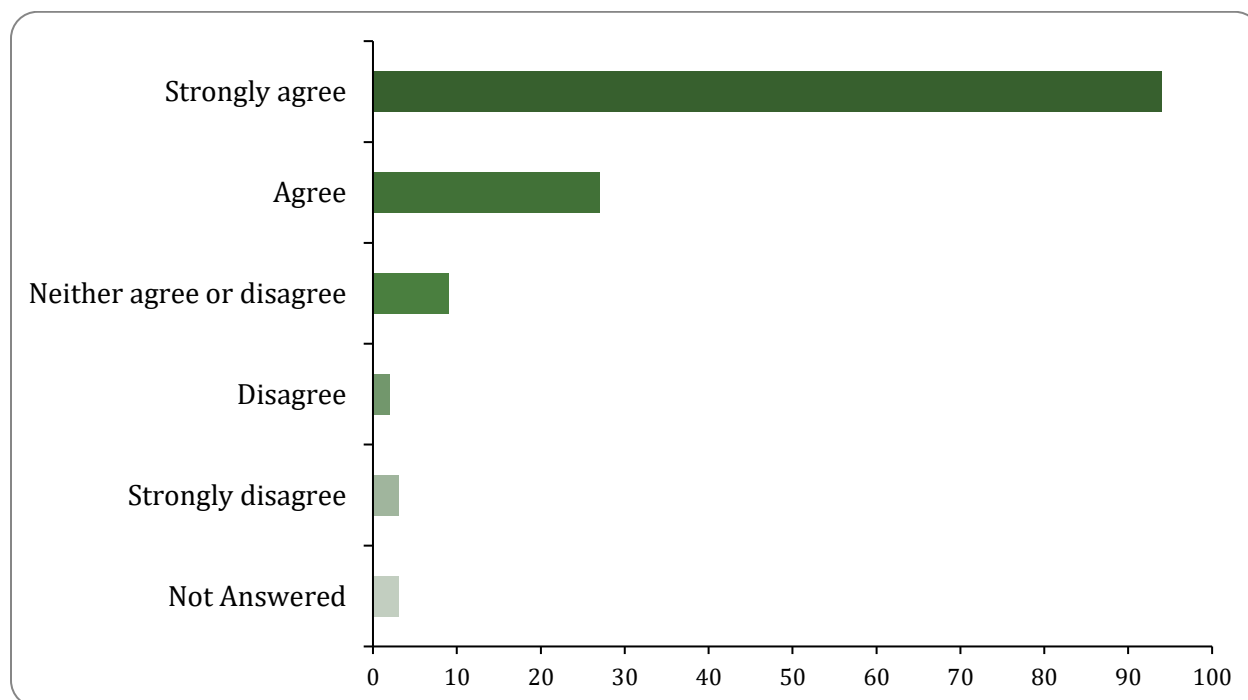
Option	Total	Percent
Strongly agree	103	75%
Agree	25	18%
Neither agree or disagree	5	4%
Disagree	1	1%
Strongly disagree	0	0%
Not Answered	4	3%

Conclusion:

The principle that plans to decommission offshore installations should be developed at the very beginning of the lifecycle of the project was agreed with by 93% of respondents, with just 1% disagreeing.

The majority of respondents agreed with this principle.

20: Do you agree that the control of use and discharge of chemicals from offshore installations should be managed in accordance with international agreements?



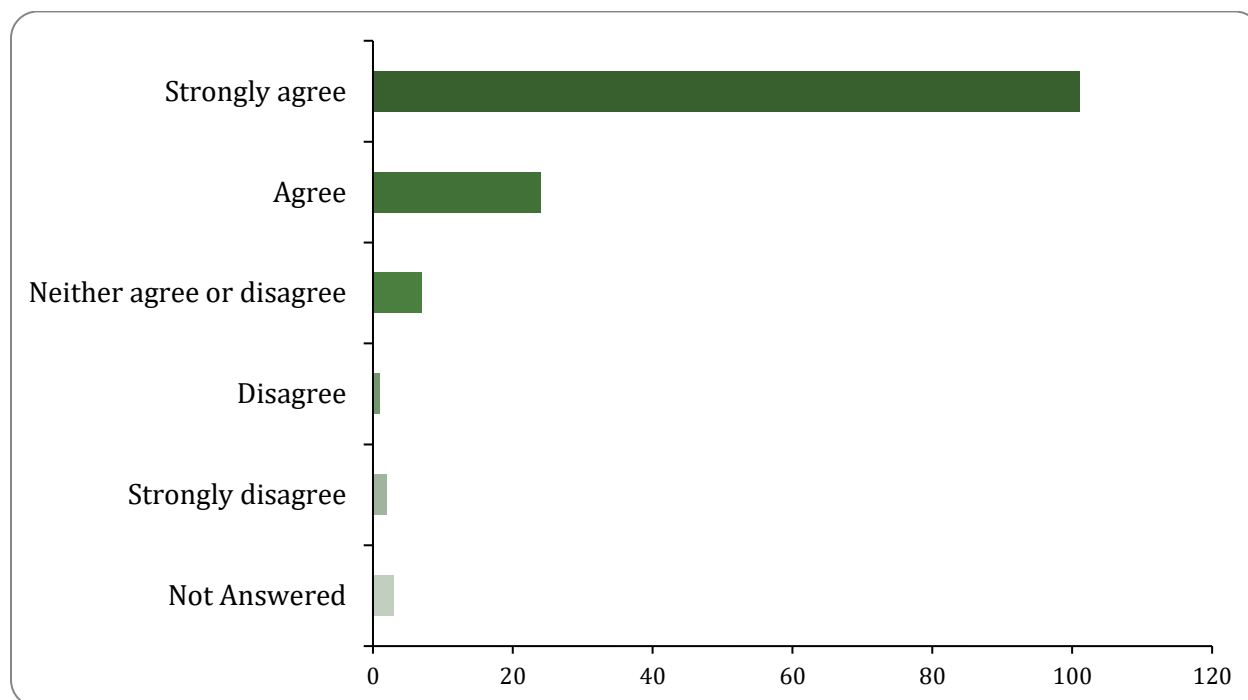
Option	Total	Percent
Strongly agree	94	68%
Agree	27	20%
Neither agree or disagree	9	7%
Disagree	2	1%
Strongly disagree	3	2%
Not Answered	3	2%
Total	135	

Conclusion:

The principle that the discharge of chemicals from offshore installations should be regulated in line with international standards was agreed with by 88% of respondents, with 3% disagreeing.

The majority of respondents agreed with this principle.

21: Do you agree that any waste deposits at sea should be conducted in line with international standards designed to protect the ecosystem and management of healthy seas?



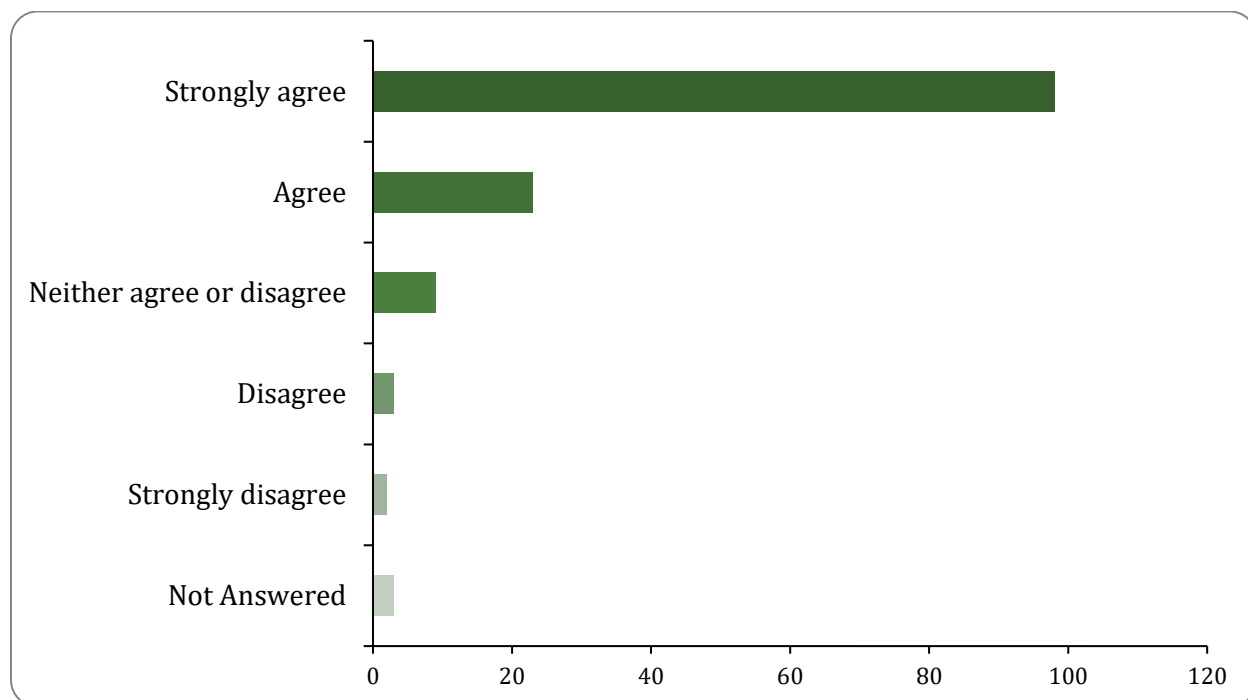
Option	Total	Percent
Strongly agree	101	73%
Agree	24	17%
Neither agree or disagree	7	5%
Disagree	1	1%
Strongly disagree	2	1%
Not Answered	3	2%
Total	135	

Conclusion:

90% of respondents agreed that waste deposits made in Manx waters should be subject to international environmental protection standards. Just 3% of respondents disagreed.

The majority of respondents agreed with this principle.

22: Do you agree that the ‘polluter pays principle’ should be employed, which requires those with permits to demonstrate financial capability to pay for any remediation or clean-up activities caused by their actions?



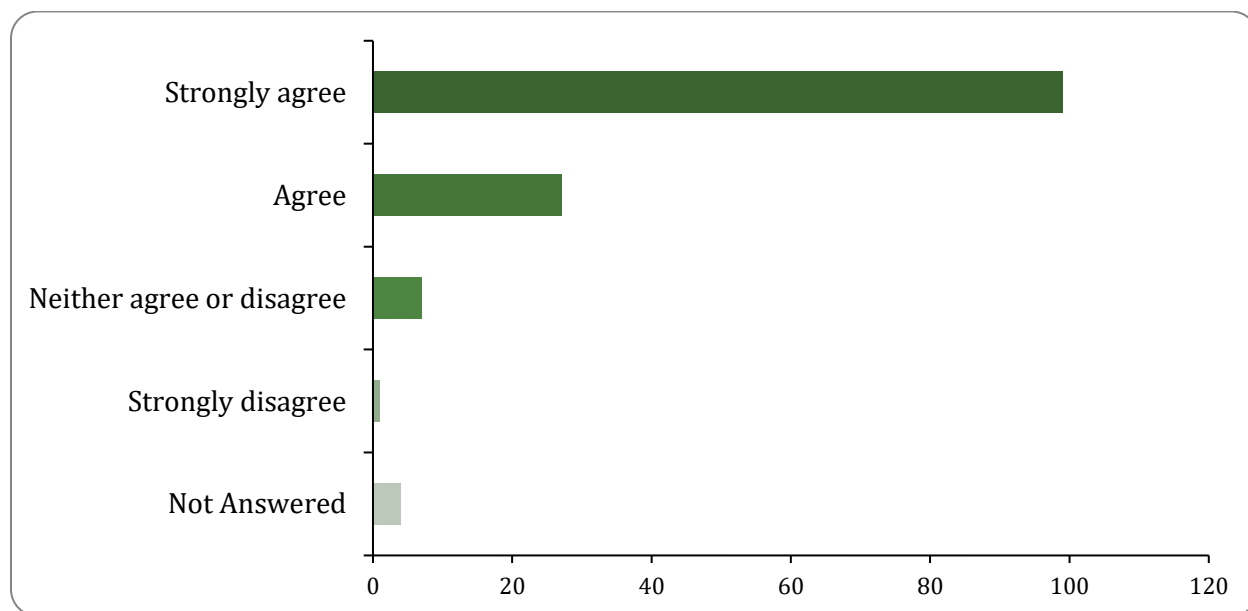
Option	Total	Percent
Strongly agree	98	71%
Agree	23	17%
Neither agree or disagree	9	7%
Disagree	3	2%
Strongly disagree	2	1%
Not Answered	3	2%
Total	135	

Conclusion:

The polluter pays principle including demonstration that a permit holder has financial capabilities to remediate the environment following pollution caused by their activities was agreed with by 88% of respondents with 3% disagreeing.

The majority of respondents agreed with this principle.

23: Do you agree that there should be provisions made for enforcement powers for operators who fail to comply with permit conditions and enforcement for non-permitted discharges?



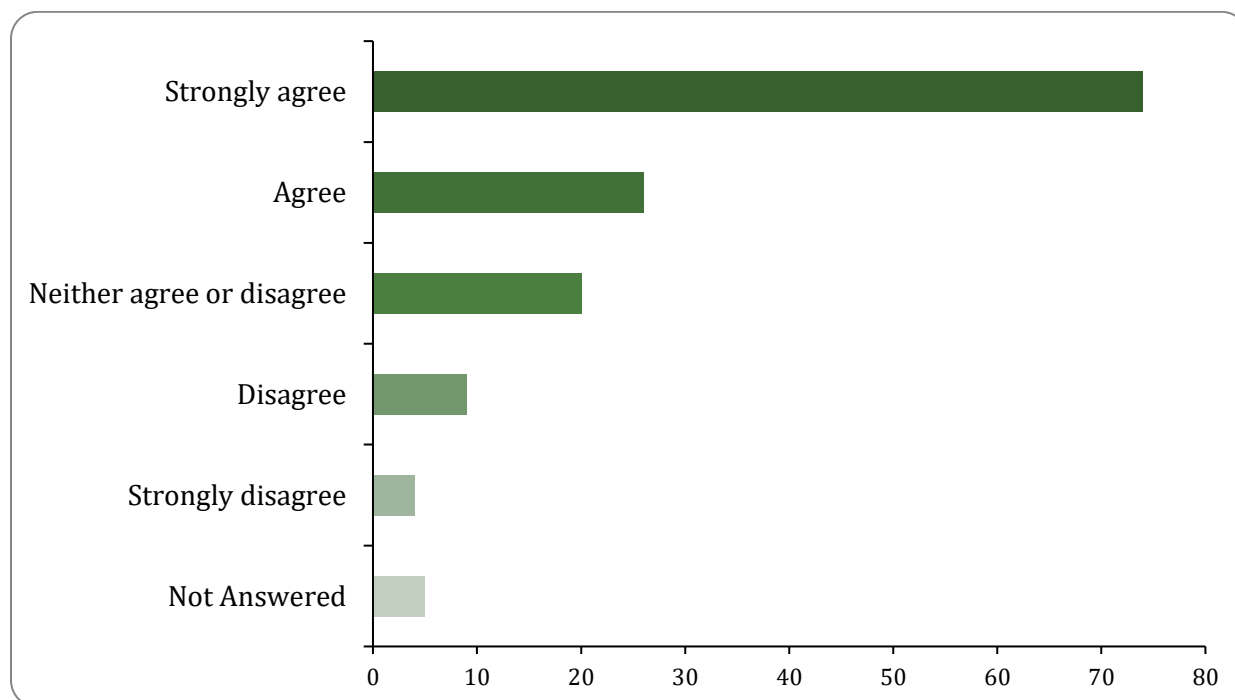
Option	Total	Percent
Strongly agree	99	72%
Agree	27	20%
Neither agree or disagree	7	5.0%
Disagree	0	0%
Strongly disagree	1	1%
Not Answered	4	3%
Total	134	

Conclusion:

The provision of enforcement powers for the regulator of permit operators who conduct non-permitted discharges was agreed with by 92% of respondents, with only 1 respondent disagreeing.

The majority of respondents agreed with this principle.

24: Do you agree that the regulator should be able to charge operators fees to cover the cost of compliance monitoring and management?



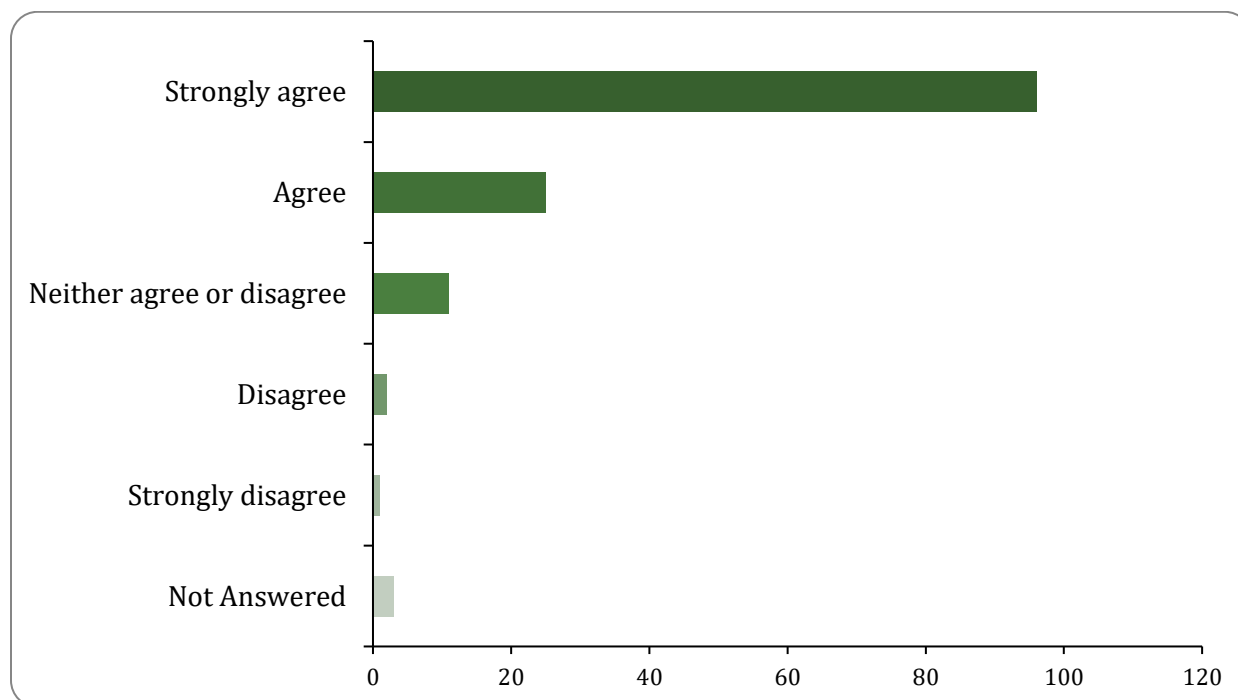
Option	Total	Percent
Strongly agree	74	54%
Agree	26	19%
Neither agree or disagree	20	14%
Disagree	9	7%
Strongly disagree	4	3%
Not Answered	5	4%
Total	133	

Conclusion:

The use of fees for charging operators for managing and monitoring compliance to environmental permits was agreed with by 73% of respondents, whilst 10% disagreed.

The majority of respondents agreed with this principle.

25: Do you agree that environmental breaches of emissions permits should be subject to strict sanctions to ensure compliance and to protect the environment?



Option	Total	Percent
Strongly agree	96	70%
Agree	25	18%
Neither agree or disagree	11	8%
Disagree	2	1%
Strongly disagree	1	1%
Not Answered	3	2%
Total	135	

Conclusion:

Strict sanctions used for breaches of emissions permits to ensure compliance and to protect the environment were deemed agreeable by 88% of respondents, with only 2% disagreeing.

The majority of respondents agreed with this principle.

26: Are there any other environmental policies relevant to protecting the island that have not been mentioned here that you think are relevant?

Option	Total	Percent
Yes	56	41%
No	61	44%
Not Answered	21	15%

There were 62 comment responses to this part of the question. Below is a summary of the topics highlighted in the comments, where they were deemed relevant to the consultation.

Table 1 Summary of responses in regards to additional policies that should be considered.

	Responses about other policies that should be included:	DEFA Comment
1	Recycling, circular economy and sustainability should drive waste management rather than optimising calorific disposal for the energy from waste facility.	This decision about waste and recycling policies should be derived from the Governments Waste Strategy, which is to be delivered by the end of 2025.
2	Protection of the seas and improved fishing policies should be introduced. Plus greater protection of Marine Nature Reserves and new recycling schemes for fishing nets, gear and bycatch waste	Fishing policy is regulated by the Fisheries team under The Fisheries Act 2012 and the Wildlife Act 1990. More information can be found at https://www.gov.im/about-the-government/departments/environment-food-and-agriculture/environment-directorate/fisheries/sea-fisheries/legislation-policy-guidance/ .
3	Areas of natural beauty, moorlands, peat lands and wildlife should be better protected including protection from development from windfarms and other green energy projects.	Ecosystems Policy Team are responsible for regulation of biodiversity and wildlife on the island. Further information can be found at https://www.gov.im/about-the-government/departments/environment-food-and-agriculture/environment-directorate/ecosystem-policy-team/ .
4	The EC Wastewater Framework Directive (2008/98/EC) should be included.	This Directive is transposed into UK legislation through the Waste Regulations 2011, Environmental Permitting Regulations 2010, Hazardous Waste Regulations 2005, List of Waste Regulations 2005, and the Environmental Protection Act 1990 all of which are to be included within the Bill allowing vires to implement where reasonable and proportionate these regulations.
5	Policies should be applied to onshore as well as offshore environments.	The proposed update to waste legislation will apply regulations to both onshore and offshore environments at the same time
6	Pesticide restrictions should be included in any environmental policies.	Pesticides are regulated by the Agriculture Division through the Agriculture Act 1961.

7	The polluter pays principle and associated sanctions should be extended to litter and illegal waste deposits.	Illegal waste deposits are already regulated under the Public Health Act 1990. Littering is an issue that can be managed under the Local Government Act 1985 and the Litter (Amendment) Act 2003 . The application of sanctions and the polluter pays principle should allow for better enforcement options in the future for illegal deposits of waste.
8	Soil standards should be regulated for.	The Code of Good Agricultural Practice advocate for soil standards.
9	Environmental protection from the impacts of farming should be regulated. Water quality parameters should be regulated to protect Isle of Man river water quality.	The proposed Bill should bring agricultural waste under the meaning of controlled waste for regulation. Additionally, eutrophication impacts are part of the OSPAR Convention, which is also included in the Bill. Other agricultural regulations can be found here, and Water Pollution Scheme including the new Environmental Quality Standards for inland waters becomes live in December 2025.
10	Sewage discharges should be regulated and restricted. Overflows should be automatically monitored and data publicized.	Sewage discharges are regulated under the Water Pollution Act 1993. Additionally, wastewater treatment criteria are intended to be regulated by an Isle of Man equivalent to the UK Environmental Permitting Regulations 2010.
11	Microplastics and single use plastics policies should be extended to include more products.	Singles use plastics policies are part of the ecosystems divisions Climate Change (Single Use Plastics) Regulations 2022.
12	Sanctions should be sufficient to enable remediation following pollution events.	Civil Sanctions and The Environmental Damage (Prevention and Remediation) (England) Regulations 2017 will seek to obtain compensation and remediation.
13	Bathing waters should be protected as a public right.	The Water Pollution Act 1993 and the Water Pollution (Bathing Water Standards and Objectives) Scheme 2021 are used to designate and regulate Bathing Waters.
14	Companies producing waste or emissions should be regulated to prevent pollution.	The Environmental Permitting Regulations seek to provide permits to companies producing emissions to the air or water and permits will require use of best available technologies to minimize emissions.
15	End of life and redundancy issues should be considered at the beginning of large infrastructure projects.	Large offshore infrastructure projects are commonly required to consider end of life and redundancy. For Offshore wind farms the OSPAR Convention (to which the Isle of Man is a party through the UK) requires decommissioning plans to be provided as part of the consenting framework.

16	Policies should be in place for pesticide and fertilizer use to minimize the impact to the environment.	Pesticide and fertiliser use is regulated through the Agriculture team and policies for their use are included in the Code of Good Agricultural Practice .
17	Waste Electronics should be regulated to prevent their disposal via the Energy from Waste Plant.	The Bill is intended to include vires for the implementation of regulations based on the UK Waste Electric and Electronic Equipment Regulations 2013
18	Legacy landfills should be monitored and regulated.	Reports on legacy landfills can be found at https://www.gov.im/about-the-government/departments/environment-food-and-agriculture/environment-directorate/environmental-protection-unit/pollution-control-monitoring/ .
19	Disposal of marine dredging should be prevented and better regulated.	Disposal of marine dredging is currently regulated by the DOI under the Water Pollution Act 1993 Part 2. The Bill intends to make it legally binding for the Isle of Man to comply with OSPAR .
20	Past industrial waste including mining waste should be regulated.	Mining Wastes are currently regulated by the Minerals Act 1986
21	Extended producer responsibility regulations should be included.	The Bill intends to provide the vires for including extended producer responsibility regulations.
22	Emissions from industry should be regulated	The Environmental Permitting Regulations should seek to regulate all emissions arising from industrial processes are require best available technology to be employed to limit emissions.
23	Civil sanctions should be introduced to take enforcement against company directors and managers for environmental pollution.	The introduction of Civil Sanctions will be possible under the proposed vires of the Bill.
24	Stricter environmental standards surpassing that of international standards should be developed for the island.	The development of environmental protection standards that surpass that of international standards would require significant investment in research and science for these areas, a resource that the Government does not currently have. There would be significant cost implications and time to develop Isle of Man specific environmental standards.
25	Green energy policies should be developed.	Energy related policies are regulated under the Climate Change Act 2021.

27: If you have any further comments, please provide them below.

There were 52 responses to this part of the question, relevant comments and themes have been summarized in the following table.

Table 2 a summary of further comments made and a DEFA response in regards to these comments

Topic Summary of Further Comments	DEFA Comments
1 More policies and regulation will add additional economic burdens to companies.	There are likely to be costs associated with the implementation of new policies and regulations. Currently the Isle of Man is 50 years behind on environmental standards leading to pollution of the environment and risk to human health and ecology. The regulations will be developed in consultation with industry in a proportionate and phased approach. Environmental protection policies are designed to help reduce costs of health care and agricultural operating costs by minimising the impact of pollution.
2 The government should provide funds to help companies improve environmental performance rather than spend money on civil service regulation.	Regulation and funding are not mutually exclusive—they are complementary tools. Regulation ensures a consistent baseline of environmental protection. Having regulations in place makes the operating landscape fair and equal.
3 Implementation of regulations from the UK should be completed proportionally as the island population and industry is not on the same scale.	The Bill is designed to provide the vires to implement regulations. Each of the regulations will be delivered through consultation with the public and with industries to make sure a reasonable and proportionate approach is developed.
4 Environmental damage caused by windfarms should be regulated, and environmental protection enhanced for this sector. Where environmental impacts will be significant development should be prevented.	The planning and consenting processes are designed to ensure that environmental impacts are rigorously assessed, transparently managed, and appropriately mitigated. The Government also considers international obligations, including the Habitats Directive, Birds Directive, and OSPAR Convention, in its decision-making. Public consultation and stakeholder engagement are integral to the process, ensuring transparency and accountability.
5 Alignment with EU regulations would be preferable to UK	The Directives are retained in UK law. Discrepancies with the regulations and discharges is mainly down to weak

	regulations, especially given the state of their inland waters and regulation on sewage discharges.	enforcement and guidance as stated by the UK Office of Environmental Protection. The Isle of Man Government supports high environmental standards and continues to monitor developments in both UK and EU law to ensure that local policy remains aligned with best practice. We remain committed to protecting our inland waters and marine environment through robust regulation, evidence-based planning, and public accountability.
6	Whole island recycling schemes should be optimized to take account of economies of scale. Greater support should be provided to the public to recycle, including bulky object collections as well as producer responsibilities applied to batteries and electronics to eliminate costs to the public.	The delivery and execution of recycling schemes are not to be regulated through this Bill, but would be included as part of the Government's Waste Strategy. The Bill will provide vires for implementing recycling targets for specific materials.
7	Environmental impacts from surrounding jurisdictions should be regulated	Several international conventions regulate environmental impacts that cross national borders, ensuring that surrounding jurisdictions are held accountable for activities that may harm shared ecosystems.
8	Extended producer responsibility should be applied to the island regulatory framework to support takeback of large household electronics and vehicles.	Vires will be included in the Bill for extended producer responsibility. Regulations may be developed to deliver schemes for recycling.
9	Single Use plastics regulation should be extended.	This is not included in the Environment Bill and is managed under the Climate Change (Single Use Plastics) Regulations 2021.
10	Sustainability and reuse schemes should be developed by the Government	The Waste Strategy will outline possible reuse and sustainability principles.
11	All waste producers and emitters should be included under the legislation making it fair	The intention is to extend the definition of controlled waste to include Agricultural waste. The Environmental Permitting regulations, if implemented would seek to regulate many industries that emit pollution.

	and transparent for all operators.	
12	Protection of food and crops should be a Government priority.	The Department of Environment, Food and Agriculture (DEFA) on the Isle of Man regulates the protection of food and crops primarily through its Plant Health division, which enforces controls to prevent the introduction and spread of harmful pests and disease and the Agricultural Development Scheme (ADS) is a key mechanism through which the Isle of Man Government, via DEFA, supports the protection and development of food and crop production on the Island.
13	The IoM should set and lead on improved environmental protection standards beyond international standards.	The development of environmental protection standards that surpass that of international standards would require significant investment in research and science for these areas, a resource that the Government does not currently have. There would be significant cost implications and time to develop Isle of Man specific environmental standards.
14	Noise and light pollution should be covered by the Environmental Protection Bill	Environmental Health can regulate noise and light pollution through the Public Health Act 1990.
15	Cradle to Grave considerations should be included in the planning stages for all new projects.	Life cycle management of large infrastructure projects are usually a built in criteria for planning approval. In regards to the offshore wind farm, cradle to grave considerations for the infrastructure are to be managed under the Marine Infrastructure Consent Licence and are a requirement under the OSPAR Convention.
16	Sustainable waste management practices which are best for the Island should be investigated.	Sustainable waste management is to be considered under the Waste Strategy.
17	Legacy landfills should be monitored and actions taken to limit their impacts on the environment.	Reports on legacy landfills can be found at https://www.gov.im/about-the-government/departments/environment-food-and-agriculture/environment-directorate/environmental-protection-unit/pollution-control-monitoring/ .
18	Education should be provided along with improved recycling schemes	Departmental regulation and associated policies will be developed with educational support, provided online.

19	Persistent organic pollutants in water should be better regulated.	The Bill seeks to provide powers to regulate facilities and companies creating emissions to the environment. In regards to Persistent Organic Pollutants (POPs) this includes eliminating dilute and disperse landfills a source of POPs, and prohibiting discharges above threshold levels from other operations.
20	Hazardous waste should be better regulated with more waste disposal options available to companies.	The Government's Waste Strategy will outline disposal routes and options. The Environment Bill will enable the design and development of hazardous waste management to modern standards.
21	Deposit of waste into Marine Nature Reserves should be ceased.	Deposits of waste into the sea are restricted through the OSPAR Convention. The Bill seeks to make compliance with the OSPAR Convention a legal requirement.
22	Green energy projects should be expanded to include options beyond wind.	Given the breadth of legislation associated with some green energy projects, the current Departmental focus is for the Offshore Wind Development and providing appropriate legislative control for environmental protection.
23	Recycling requirements and targets should be set in primary legislation	Recycling requirements and targets will be able to be regulated using powers in the primary legislation.
24	Domestic pesticide use should be restricted.	The types of domestic pesticide available on the Isle of Man market will be regulated through UK markets. The Bill does not consider domestic pesticide regulation.
25	Financial capabilities to pay for remediation and end of life management should be secured prior to allowing companies to develop large infrastructure projects. Financial mechanisms should be put in place to ring fence money for remediation.	These financial capabilities and end of life management are intended to be regulated under the Bill.
26	Limit immigration to protect the environment.	Population growth and protection from over development is covered by the Planning Area Plans and Government Strategic Plan.
27	Environmental Compensatory measures should be regulated for offshore wind farms	Compensatory measures for offshore wind farms should be considered under the Marine Infrastructure Management Act

28	High calorific wastes should be sent to the EfW to optimize energy recovery over recycling	Utilisation of waste and disposal routes are to be guided by the Governments Waste Strategy in regards to what wastes are sent the Energy from Waste (EfW) Plant.
29	Financial sanctions and environmental permitting fees should only be used for environmental protection and not as a Departmental asset.	The use of Environmental Permitting fees will be utilised to manage the costs associated with monitoring of permitted sites.
30	The precautionary principle should be applied to the islands environmental protection policies	The precautionary principle is to be included through the
31	Persistent organic pollutants should be regulated.	The UK REACH Regulations 2021 are intended to be applied to the Isle of Man using vires in this Bill. The use of persistent, toxic or bioaccumulative substances would be regulated.
32	Perfluorinated substances should be regulated and monitored for.	The UK REACH Regulations 2021 are intended to be applied to the Isle of Man using vires in this Bill. The use of persistent, toxic or bioaccumulative substances would be regulated.
33	Greater marine protection should be developed as part of the wind farm legislation development.	Marine protection should be delivered through Marine Infrastructure Management Act 2016 and current legislation.
34	Use of chemicals in offshore developments should be aligned with OSPAR	The OSPAR convention is intended to be made legally binding through the Bill which seeks permission to update the Water Pollution Act 1993 Part 2 to include OSPAR.
35	Best practice from surrounding jurisdictions should be considered in addition to the UK.	Environmental Regulation from surrounding jurisdictions were reviewed prior to the development of the Bill.

Appendix 1: Public Health Consultation Response



**Isle of Man
Government**
Reillys Eilan Vannin

Cabinet Office

Oik Coonceil ny Shirveishee

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29th July 2025

Dear Ms Goosey

Re. Consultation on the Environmental Protection Bill 2025

Thank you for providing Public Health with an opportunity to respond to the above consultation on proposed legislation to safeguard the Island's public health and its natural environment.

This response is submitted on behalf of the Public Health directorate of Cabinet Office and may be published in full by DEFA.

The proposed regulatory changes set out in this consultation will serve to protect and improve the environmental conditions in which people live and work. They accordingly align with goals of the forthcoming Public Health Strategy, and the associated Marmot principles of –

- ensuring a healthy standard of living for all;
- creating and developing healthy and sustainable places and communities; and
- pursuing environmental sustainability and health equity together.

Given Public Health's strategy and remit we would accordingly offer broad support for the proposed objectives of the Bill in the context of DEFA's broader strategy to bring the Island's environmental protection regulations in line with the UK where deemed reasonable and proportionate, as set out in the attached appendix to this letter.

Recognising that this consultation is the start of programme of legislative changes that may have significant public health impact for the Island, Public Health would welcome the opportunity to be involved in the development of the secondary legislation that will be introduced as a consequence of this Bill.

Yours sincerely

Dr Matthew Tyrer
Director of Public Health

Public Health's response to the DEFA consultation on the Environmental Protection Bill 2025.

1. Introduction

Public Health's interest in environmental protection

- a. In support of the strategic objectives¹ of the Island Plan² the forthcoming Public Health Strategy 2025-30 emphasises the importance of ensuring the health and wellbeing of our residents remains a priority in all policy decisions.
- b. This is because the health and wellbeing our residents is shaped by the world around us, the places we live, work and grow, the air we breathe, the food we eat, and the availability of opportunities.
- c. In the context of the policy objectives being consulted upon, Public Health's work includes –
 - i. gathering data and research to analyse population health trends, and inform effective policies [*Health Intelligence*]
 - ii. providing impartial and evidence-based advice to support and improve policy-making and initiatives that create environments that enable healthier choices and improve wellbeing in the long-term [*Health Improvement*]
 - iii. preventing and managing environmental hazards, and ensuring emergency preparedness, while keeping the public informed of any major developments and incidents [*Health Protection*]
 - iv. collaborating with partners to drive evidence-based service improvements [*System Leadership*]

The wider determinants of health and the Marmot principles

- d. The work undertaken should have regard to the factors that shape health and wellbeing beyond individual choices; encompassing the social, environmental, and economic conditions in which people are born, grow, live, work and age.
- e. These “wider determinants of health” are addressed by Public Health through a framework known as the Marmot principles, which were developed by Professor Sir Michael Marmot as part of the Marmot Review³.
- f. Of the eight Marmot Principles, as set out in Public Health's strategy, the following three have been identified as relevant to this consultation –

¹ i.e. “An Island of health and wellbeing” and “An environment we can be proud of”.

² *Our Island Plan: 2025/2026 update. Building a secure, vibrant and sustainable future for our Island*, Isle of Man Government, March 2025 [GD 2025/0018]. Site: <https://islandplan.im/media/4f2fkqzs/island-plan-2025-26.pdf>, checked 25th June 2025.

³ *Fair Society, Healthy Lives (the Marmot Review)*, Michael Marmott, Peter Goldblatt, Jessica Allen, et al, Strategic Review of Health Inequalities in England post-2010, February 2010. Site: <https://www.parliament.uk/globalassets/documents/fair-society-healthy-lives-full-report.pdf>, checked 3rd July 2025.

“4. Ensure a healthy standard of living for all

Health is shaped by everyday living conditions. People need safe housing, affordable heating, nutritious food, and access to transport and essential services to stay well. When these are lacking, it’s harder to maintain health or recover from illness. Supporting initiatives that improve living standards helps ensure everyone has the stability and resources they need to take care of their health.

5. Create and develop healthy and sustainable places and communities

The places where people live influence how active, connected, and safe they feel. Poor housing, lack of green space, pollution, and isolation can all contribute to worse health outcomes. Supporting the development of healthier, more inclusive neighbourhoods makes it easier for people to stay well and feel part of their community.

8. Pursue environmental sustainability and health equity together.

Issues like poor housing, air pollution, and lack of green space affect people’s health, especially those already facing disadvantage. Environmental improvements such as better housing, clean air, and access to nature can help prevent illness and create healthier communities now and in the future.”

- g. The implementation of these principles are not the responsibility of a single public body, instead it requires collaboration across government, healthcare, education and the community sectors.
- h. The principles that are the subject of this consultation align well with Public Health’s functions and goals.

2. Public health benefits of improving environmental protection

- a. The Isle of Man’s designation as a UNESCO Biosphere supports the 5th and 8th Marmot principles, as our environment plays a crucial role in our health and wellbeing.
- b. Access to green spaces (e.g. parks, fields and forests) and blue spaces (i.e. rivers and bodies of water) as the positive benefit of protecting against anxiety and depression⁴.
- c. Environmental pollution presents a significant risk to the Island’s biosphere, and can also have a negative impact on our healthy standard of living (n.b. the 4th Marmot principle). For example, of the 10 leading global risks of cancer identified in 2019, 2 were linked to environmental pollution⁵. These were ambient particulate matter pollution and occupational exposure to asbestos.

⁴ *Ambient greenness, access to local green spaces, and subsequent mental health: a 10-year longitudinal dynamic panel study of 2.3 million adults in Wales*, Geary RC and others, *Lancet Planetary Health*, 2023: 7: E809-818. Site: [https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(23\)00212-7/fulltext](https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(23)00212-7/fulltext), checked 30th June 2025.

⁵ *The global burden of cancer attributable to risk factors, 2010-19: a systematic analysis for the Global Burden of Disease Study 2019*. Tran, Khanh Bao *et al*, *The Lancet*, Volume 400, Issue 10352, 563-591, 20th August 2022. Site: [https://www.thelancet.com/journals/lancet/article/piiS0140-6736\(22\)01438-6/fulltext](https://www.thelancet.com/journals/lancet/article/piiS0140-6736(22)01438-6/fulltext), checked 30th June 2025.

- d. UK data on the fraction of cancer attributable to modifiable risk factors also identified a number of environmental factors, including occupation, radiation (UV and ionising) and air pollution⁶.
- e. Environmental pollution is also a cause of mortality and ill-health via a variety of means other than cancer. Air pollution from road transport, responsible for up to 70% of air pollution in urban areas in the UK, has been linked to asthma, chronic bronchitis, heart and circulatory disease⁷.
- f. The health risks of water pollution are also well known. These may typically present as cases of vomiting and diarrhoea occurring due to bacterial infections following the ingestion of contamination water.
- g. However, there are other health risks from water pollution. Notably, there are ongoing public health concerns in Jersey⁸ due to high levels of PFAs (per- and polyfluoroalkyl substances) found in Jersey's groundwater and private drinking water⁹. PFAs have been identified as an emerging chemical risk in Europe, and are now being considered for a range of regulatory controls under the EU's chemicals regulation¹⁰.
- h. While the Island's latest mortality data is not sufficiently detailed as to encompass the risk factors that led to mortality, it does show the leading causes of death on the Island are due to either cancer or respiratory diseases¹¹, a proportion of which would be due to the above environmental factors.
- i. Due to the Island's cultural and economic links with the UK, it is also likely the Island's population has similar health risks from environmental pollution.
- j. Public Health would accordingly support new legislation to ensure the Island has the means to protect our environment from pollution for the benefit of our health and wellbeing.

3. Consultation response

- a. Given Public Health's strategy and remit we would accordingly offer broad support for the proposed objectives of the Bill in the context of DEFA's broader strategy to bring the Island's environmental protection regulations in line with the UK where deemed reasonable and proportionate.

⁶ *The fraction of cancer attributable to modifiable risk factors in England, Wales, Scotland, Northern Ireland, and the United Kingdom in 2015*. Brown, K.F., Rumgay, H., Dunlop, C. *et al*, Br J Cancer 118, 1130 – 1141 (2018). Site: <https://doi.org/10.1038/s41416-018-0029-6>, checked 3rd July 2025.

⁷ *Air Quality*, Fifth report of session 2009-10, Volume 1, Environmental Audit Committee, House of Commons [HC 229-I], 16th March 2010. Site: <https://publications.parliament.uk/pa/cm200910/cmselect/cmenvaud/229/229i.pdf>, checked 3rd July 2025.

⁸ *Insight: Blood letting, pills, plasma removal... The Jersey PFAS treatments under consideration*. Jodie Yettram, Bailiwick Express, 16th January 2025. Site: <https://www.bailiwickexpress.com/news/explained-what-pfas-treatments-are-being-considered/>, checked 3rd July 2025.

⁹ *Jersey 'forever chemicals' contaminated private water supply*, BBC, 3rd August 2023. Site: <https://www.bbc.co.uk/news/world-europe-jersey-66361242>, checked 3rd July 2025.

¹⁰ *Scientific evaluation of the proposal to restrict per- and polyfluoroalkyl substances (PFAS) – Current Status*. European Chemicals Agency, June 2025. Site: https://echa.europa.eu/documents/10162/67348133/upfas_evaluation_state_of_play_en.pdf/d1ad6892-e726-84a7-d2dd-74bbf8fa09af?t=1727262011016, checked 3rd July 2025.

¹¹ *Mortality Report 2022*, Public Health Directorate, Cabinet Office, August 2024. Site: https://www.gov.im/media/1386119/mortality-report-2022-final_compressed.pdf, checked 3rd July 2025.

Appendix 2: MNFU Consultation Response

About you

1. Which option best describes your interest in responding to this consultation?

Member of public

Isle of Man Government

Business owner or Stakeholder

Member of Tynwald

☒ Other (please specify) Other: Representative organisation

2. Are you responding on behalf of an organisation or industry?

☒ Yes

No

Organisation / industry: Manx National Farmers Union

Number of people or organisations represented: 180 est

3. May we publish your response?

Please read our Privacy Policy for more details and your rights.

(An answer is required)

- ☒ Yes, you can publish my response in full
Yes, you may publish my response anonymously
No, please do not publish my response

Questions

A robust set of regulations governing environmental protection for onshore and offshore industrial activities is required to protect the environment and mitigate impacts from these operations, ensuring sustainable management.

Current sources of primary legislation in the Isle of Man do not contain vires that will enable modern and proportionate regulatory environmental framework to be developed. It is for this reason that new primary legislation needs to be enacted to facilitate the necessary secondary regulations. This primary legislation takes the form of an Environmental Protection Bill with four main objectives.

The objective of the Bill is to introduce legislation that will deliver:

1. Internationally recognized regulations and standards for environmental protection
2. Regulatory environmental protection framework for offshore wind farm development
3. Alignment of the Water Pollution Act, Part 2 with international commitments under the OSPAR Convention and the London Protocol
4. Introduce the Polluter Pays Principle for waste, emissions and pollution

Further information about the secondary legislation that will be enabled through the vires in this bill are supplied as supporting information and can be read in the accompanying document (Supporting Information).

Objective 1: Establish internationally recognized regulations and standards for environmental protection to safeguard the island now and for future generations

The legislation should reflect an equivalent level of environmental protection by DEFA as is provided in comparable jurisdictions to provide a comprehensive framework to ensure protection of the environment.

Once the Bill is enacted, it is anticipated that this new primary legislation will then provide a route under which secondary legislation will be enacted, covering what are currently perceived to be gaps in the environmental protection regulatory framework. For the basis of this Bill, the Isle of Man is looking to align with the UK position where it is proportionate and reasonable to take such an approach. There is a recognition, however, that what may be appropriate in the UK where there is a mature and vast industry at various stages of exploitation, production, and decommissioning, may not always be appropriate in respect of an Isle of Man operation. The regulatory response should be proportionate to the level of environmental risk and possible impacts, as well as operator performance.

4. Do you agree that the Isle of Man should align with the UK regulatory position for environmental protection associated with industrial operations, where it is proportionate and reasonable to take such an approach?

- Strongly agree
- Agree
- ✓ **Neither agree or disagree**
- Disagree
- Strongly disagree

5. Do you agree that regulation of waste and hazardous wastes are best aligned with UK legislation to provide environmental protection and meet international standards?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- ✓ **Strongly disagree**

6. Do you agree that measures should be developed to improve reuse and recycling in line with the waste hierarchy and waste disposal efficiencies, including environmental targets for waste minimisation and waste prevention plans?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- ✓ **Strongly disagree**

7. Do you agree that the Island should produce a waste strategy and management plan for all types of waste generated across the island (including for offshore industries)?

- Strongly agree
- Agree
- Neither agree or disagree
- ✓ **Disagree**
- Strongly disagree

8. Do you agree that the government should develop re-use and recycling targets for waste reduction to align with the Climate Change Plan and Waste Strategy via adoption of the waste hierarchy?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- ✓ **Strongly disagree**

9. Do you agree that definitions and standards should be developed to allow for some wastes to be defined as by-products or end of waste to encourage resource sustainability and minimise waste?

- Strongly agree
- Agree
- ✓ **Neither agree or disagree**
- Disagree
- Strongly disagree

10. Do you agree that landfills should be designed, constructed and managed in accordance with the type of waste they receive? Any new landfill shall not be a dilute and disperse landfill site.

- Strongly agree
- ✓ **Agree**
- Neither agree or disagree
- Disagree
- Strongly disagree

11. Do you agree that waste acceptance criteria should be implemented to identify a standard for which wastes should be treated or deposited in landfills to maximise resource protection and minimise environmental hazards?

- Strongly agree
- ✓ **Agree**
- Neither agree or disagree
- Disagree
- Strongly disagree

12. Do you agree that agricultural waste should be managed under the same regulatory framework as all other wastes including industrial, commercial and household waste, when it is hazardous, mixed with other waste or improperly managed?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- ✓ **Strongly disagree**

13. Do you agree that provisions should be put in place for regulators to take action to prevent or mitigate pollution through project design and operational permits for industrial installations onshore and offshore?

- Strongly agree
- Agree

- Neither agree or disagree
- ✓ **Disagree**
- Strongly disagree

14. Do you agree that industrial operations should employ best available technologies when being designed, equipped, and operated to minimise emissions?

You can read more about best available technologies in the Offshore Pollution Prevention and Control (PPC) Guidance on the UK Government Website.

- Strongly agree
- Agree
- Neither agree or disagree
- ✓ **Disagree**
- Strongly disagree

15. Do you agree that unplanned discharges or emissions can cause severe environmental damage and regulations are required to ensure that companies implement robust safety measures to prevent incidents, and emergency response protocols to manage such incidents?

- Strongly agree
- Agree
- ✓ **Neither agree or disagree**
- Disagree
- Strongly disagree

Objective 2: Facilitate the sustainable development of offshore energy by creating a clear regulatory environmental protection framework for future developments including offshore wind

Environmental protection measures are to be put in place to mitigate potential risks from pollution, emissions, and chemical use associated with offshore wind and other marine installations. Operators should be required to manage and, where feasible, substitute harmful chemicals with less hazardous alternatives, aligning with best environmental practices. Emissions and discharges from offshore installations must be closely monitored, reported, and controlled in accordance with suggested regulatory standards (UK Offshore Chemicals Regulations (2005)). Waste generated during construction, operation, and maintenance must be handled responsibly and disposed of in a safe, sustainable manner. Additionally, developers should be obligated to submit and implement decommissioning plans, ensuring that offshore infrastructure is removed at the end of its operational life and that environmental impacts are minimized. These plans must address pollution prevention, site restoration, and long-term environmental protection.

16. Do you agree that regulation controls should be developed for the use and discharge of chemicals in offshore installations, requiring operators to assess the toxicity, persistence, and bioaccumulation potential of chemicals before use?

- ✓ Strongly agree
Agree
Neither agree or disagree
Disagree
Strongly disagree

17. Do you agree that offshore developments must demonstrate adherence to ecological standards to minimize habitat disruption and other adverse environmental impacts?

- ✓ Strongly agree
Agree
Neither agree or disagree
Disagree
Strongly disagree

18. Do you agree that emergency plans should be developed setting out arrangements for responding to and reporting on incidents which cause, or may cause harm?

- ✓ Strongly agree
Agree
Neither agree or disagree
Disagree
Strongly disagree

19. Do you agree that decommissioning of installations should be planned from the beginning to allow sustainable end of life waste disposal and the environment to be restored?

- Strongly agree
- ✓ **Agree**
- Neither agree or disagree
- Disagree
- Strongly disagree

Objective 3: Amend the Water Pollution Act 1993, Part 2, to align with international commitments under the OSPAR Convention and the London Protocol, addressing emerging environmental challenges in water pollution control

OSPAR (the Oslo-Paris Convention for the Protection of the North-East Atlantic) is an international environmental treaty aimed at safeguarding the marine environment of the North-East Atlantic. It brings together 15 contracting parties, including countries bordering the North-East Atlantic, to coordinate efforts in preventing marine pollution and promoting sustainable management of marine resources. The convention covers a wide range of issues, such as reducing hazardous substances in the ocean, protecting marine biodiversity, and addressing climate change impacts. Through OSPAR there is a focus on reducing pollution from land-based sources, shipping, and offshore activities like oil and gas extraction.

The London Protocol is an international treaty designed to protect the marine environment by regulating the dumping of waste at sea. The Protocol establishes strict controls on marine pollution by prohibiting the disposal of certain hazardous substances and limiting the types of waste that can be dumped into the sea. It focuses on preventing pollution from ships, offshore installations, and other sources, and promotes environmentally sound waste management practices. The Protocol encourages the use of alternative disposal methods and requires the use of best available technologies to reduce environmental impact.

The two treaties collaborate to safeguard the marine environment. As a signatory, the UK extends its obligations to its Crown dependencies. Our international commitments will be upheld through the inclusion of duties under Part 2 of the Water Pollution Act 1993. This Bill aims to grant the necessary authority to implement these amendments to the Water Pollution Act 1993.

20. Do you agree that the control of use and discharge of chemicals from offshore installations should be managed in accordance with international agreements?

- Strongly agree
- ✓ **Agree**
- Neither agree or disagree
- Disagree
- Strongly disagree

21. Do you agree that any waste deposits at sea should be conducted in line with international standards designed to protect the ecosystem and management of healthy seas?

- Strongly agree
- ✓ **Agree**
- Neither agree or disagree
- Disagree
- Strongly disagree

Objective 4: The Bill is intended to provide a framework for pollution response and enforcement to minimise pollution impacts and to prevent long term environmental harm from such incidents. Where possible the cost of pollution should be borne by those causing it.

The proposed Bill introduces the Polluter Pays Principle, a fundamental concept in international environmental law that ensures those responsible for causing environmental harm are held financially accountable for the costs associated with the remediation and mitigation of that damage. By embedding this principle into law, the Bill seeks to create a clear and fair system where polluters bear the full cost of restoring and protecting the environment, rather than burdening taxpayers or communities with the financial responsibility. This legislative measure is designed to promote long-term sustainability by incentivising businesses and individuals to minimise environmental impact, while fostering greater accountability and fairness in the management of natural resources. The Bill aligns economic incentives with environmental stewardship, reinforcing the idea that responsible parties must address the full costs of their actions, ultimately leading to a cleaner, healthier environment for all.

For offshore energy projects including offshore wind farms this principle ensures that developers and operators of these projects are financially responsible for any environmental damage caused during construction, operation, or decommissioning. Offshore wind farms, while a key part of the transition to renewable energy, can have significant impacts on marine ecosystems, such as disturbances to seabeds, marine life, and local habitats. Under this Bill, operators would be required to cover the costs of mitigating these impacts, as well as funding the restoration of any damage caused. This includes ensuring that any waste from decommissioning wind turbines is properly managed, and that the long-term health of marine environments is safeguarded.

22. Do you agree that the 'polluter pays principle' should be employed, which requires those with permits to demonstrate financial capability to pay for any remediation or clean-up activities caused by their actions?

- Strongly agree
- Agree
- Neither agree or disagree
- ✓ **Disagree**
- Strongly disagree

23. Do you agree that there should be provisions made for enforcement powers for operators who fail to comply with permit conditions and enforcement for non-permitted discharges?

- Strongly agree
- Agree
- Neither agree or disagree
- ✓ **Disagree**
- Strongly disagree

24. Do you agree that the regulator should be able to charge operators fees to cover the cost of compliance monitoring and management?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- ✓ **Strongly disagree**

25. Do you agree that environmental breaches of emissions permits should be subject to strict sanctions to ensure compliance and to protect the environment?

- Strongly agree
- Agree
- ✓ **Neither agree or disagree**
- Disagree
- Strongly disagree

Other comments and feedback

26. Are there any other environmental policies relevant to protecting the island that have not been mentioned here that you think are relevant?

✓ Yes

No

If 'yes' please provide details:

Please see additional information including current legislation, regulations and policies affecting agriculture below;-

27. If you have any further comments, please provide them below.

Further comments and feedback:

Notes on the questions;-

Question 13 may risk increase in cost of projects or restrict what comes forwards. The question needs to specify what type of project it is aimed at as it could potentially unnecessarily restrict or constrain smaller projects.

Question 14 does not specify offshore.

Question 15 note that this is already very heavily regulated.

Question 22 note the risk that this could prevent investment.

Question 23 not enough information or clarity provided regarding who this is targeted at. Question

24 this could risk reducing investment and IOM Government should be doing this as a matter of course, not charging additional fees for its own obligations.

Question 25 not enough detail has been provided. Question should be fully detailed.

Additional comments below;-

Additional Information submitted with the response to the Environmental Bill Consultation

1. Under the Agricultural Development Scheme Farms must meet both Statutory Management Requirements (SMR) and Standards of Good Agricultural and Environmental Condition (GAEC's) through Cross Compliance

- No 61/08 Cross Compliance Penalties • No 62/08 Cross Compliance Standards

and can be heavily penalised for any breaches. SMR's include protection of flora and fauna, groundwater, control of sewage sludge usage, plant protection products, prevention of hormone and beta-agonist usage, soil erosion, post harvest management of land, restrictions on burning, maintaining soil organic matter, crop rotation, stubble management, under and overgrazing, supplementary feeding, litter, waste and scrap, protection of habitats, wildlife, and archaeological sites, the application of lime, fertilizer and pesticides, boundaries, and weed encroachment.

A farmer can face prosecution for any breaches, plus the imposition of a penalty under the Agricultural Development Scheme, or the latter only. Farms comply with the **Codes of Good Agricultural Practice** as published by DEFA. Most farms are also engaged in the Agri-Environment Scheme.

Severe penalties are imposed under SMR 3 for any breaches as set out in the cross-compliance document.

2. All farms that supply into the food or feed chain are Red Tractor Assured. Red Tractor have similarly high standards that farms must comply with.
3. Agricultural businesses comply with relevant elements of the following legislation;

The Wildlife Act 1990

Animal Health Act 1996

Animal By-Product Regulations 2019

The Climate Change Act 2021

Dangerous Substances Directive (67/548/EEC) Where these substances are used, manufactured, stored or handled, farmers will be expected to comply with relevant legislation, codes of practice or other relevant good practice.

4. Farmers must not use any plant protection product unless; it has been approved under the Plant Protection Products Regulations 2005 ("PPPR") or the Control of Pesticides Regulations 1986. Usage must also comply with LERAP Local Environment Risk Assessment for Pesticides

Farms must comply with Articles 14, 15, 17(1), 18, 19 and 20 of Regulation (EC) No 178/2002 (which lays down the requirements of food law) covered by the Food Act 1996, to comply with SMR 9 on Food and Feed.

Food Hygiene Regulations;-

Farms must prevent contamination arising from water, soil, feed, veterinary products, pesticides, waste etc. and need to prevent animals and pests from causing contamination and you will need to take account of results from tests relevant to animal and human health. 'European Communities (Food Hygiene laws) (Application) Order 2007'

5. Recent river and bathing water quality reports as follows;

The 2021 River Monitoring Report found that 98 % of monitored sites achieved an **"Excellent"** chemical classification, indicating very high water quality.

- Broader trends from DEFA monitoring (2015–2019) showed about 95% of sites reached **Very Good** chemical status.
- The 2023 River Monitoring Report concluded that 98% of monitored river sites achieved either **Excellent or Good** chemical status—consistent with previous high standards.

DEFA and third-party summaries indicate the Island's rivers remain of consistently high chemical quality, comparable to prior years and benefiting aquatic life and biodiversity.

The 2024 Bathing Water Report concluded that all eight officially designated bathing areas achieved at least **Good**, with many remaining **Excellent**. Changes in ratings included:

- Port Erin dropped from **Excellent to Good** (due to unusually wet summer weather).
- Castletown **improved from Sufficient to Good**.
- Other designated sites—North Ramsey, Glen Wyllin, Bay ny Carrickey, Douglas Central, South Ramsey, Port St Mary **retained Good or Excellent status**.
- **Peel and Fenella failed to meet the standards, largely because they lack sewage treatment infrastructure.**
- Laxey improved from **Insufficient to Good**

Buffer strips are effective mitigations practiced by farms to prevent run-off in to watercourses from slurry, fertilizer etc.

While the MNFU recognise the need for IOM Government to address the issue of historic landfill, and future offshore developments, the agricultural sector should not, inadvertently or otherwise, be further pressured by additional unnecessary legislation, when it cannot be evidenced that agriculture has caused environmental damage or is at high risk of doing so, taking in to account the low impact of the sector as recorded for the last few years and the significant robust controls already in place.

Risks around placing further restrictions or charges around essential chemicals for agriculture such as sheep dip will lead to significant and widespread welfare issues. IOM Government would be recommended to consider the adverse affect on the industry and the Islands livestock before deciding on additional legislation in this area.

River reports as listed (where it is often speculated without evidence that agriculture is responsible for polluting on Island) are indeed recording excellent quality in our freshwater systems. The current regulations and controls have been more than sufficient to prevent or manage any risk of pollution as demonstrated by the excellent river quality and high standard of farming practiced on the Island, supporting ecology and biodiversity, and giving us unique whole nation biosphere status.