Cyswllt Amgylchedd Cymru | Wales Environment Link

30 by 30: Land and sea for nature's recovery in Wales

22 April 2021

Introduction

We welcome the commitment by the Welsh Government to protect 30% of land and sea for nature by 2030, alongside the same commitment made by the UK Government[1]. This is a critical opportunity to protect vital habitats and species and restore degraded ecosystems vital for both wildlife and people, responding to the unfolding nature and climate emergency.

Showing that it can be delivered across Wales and the UK will demonstrate international leadership, as support grows for the adoption of a target to protect and effectively manage 30% of the land and sea by 2030 at the Convention on Biological Diversity COP 15 summit in 2022. Protecting 30% of land and sea for nature would demonstrate that these areas are treasured resources for people too and should reward the efforts of landowners and managers, as well as marine and coastal stakeholders, to maintain and restore biodiversity. Farmers and land managers should be fairly remunerated where they are managing their land to benefit nature and wildlife; WEL is calling for this to be central to the developing Sustainable Farming and Land Management approach. The essential services provided by healthy ecosystems – like carbon sequestration, clean water and mitigation of flooding, mean that restoring nature will provide far-reaching benefits to people and a significant return on investment[2].

In this briefing, we set out the conditions that WEL believes should be met for land and sea to be effectively protected for nature and counted towards the 30% target. We argue that, in order to contribute to meeting the 30% target, areas should be both **protected in the long term and be well managed, and in good or recovering condition.**

It is essential that the target is applied as 30% of land and 30% of sea rather than the two being combined. We consider that meeting a target of 30% of land and 30% of sea by 2030 is achievable. In combination with more sustainable management of land and seas across the whole of Wales, it will provide a foundation for recovery of habitats and species and a nature-positive economy for everyone.

This briefing addresses the following questions:

[1] High Ambition Coalition for Nature and People https://www.hacfornatureandpeople.org/

[2] RSPB and Cambridge Econometrics 2021 - The costs and benefits of nature based solutions to mitigate climate change https://www.rspb.org.uk/our-work/our-positions-and-casework/our-positions/wildlife-and-the-economy/

- How much land and sea are currently protected for nature in Wales?
- How should the 30% target be defined on land?
- What should count towards the 30% target on land?
- How should the 30% target be defined at sea and what should count towards it?
- What needs to happen to achieve 30% by 2030 in Wales?

How much land and sea are currently protected for nature in Wales?

Land

The UK reports on the extent of protected areas on land as one of the indicators of progress towards the 2020 Aichi targets for biodiversity. In 2014 the protected areas indicator was expanded[3], so that wider landscape designations including National Parks and AONBs were included in the reporting alongside areas designated specifically for nature conservation: Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar sites.

With the wider landscape designations included, 29.4% of land in Wales is currently within protected areas. However, when you exclude those areas of National Parks and AONBs that are not covered by a specific nature conservation designation, **the percentage cover of land protected for nature in Wales currently stands at just 10.6%**[4]. Worryingly the very limited monitoring data for the current condition of this land means that we do not know whether these areas are delivering effective protection for nature. So while we cannot produce a precise figure, we know that the area of land effectively protected for nature currently will be less than 10.6%.

Sea

There are currently 139 marine protected areas (MPAs) in Wales[5], comprising 13 Special Protection Areas (SPAs); 15 Special Areas of Conservation (SACs); 1 Marine Conservation Zone (MCZs); 107 Sites of Special Scientific Interest (SSSIs); and 3 Ramsar sites. These sites overlap, with some marine areas carrying multiple designations, indicating the complex important habitats and species types, within similar boundaries. The SSSIs included are coastal and do not extend beyond the lowest tide. Further MCZ designations for nationally important marine features are expected soon.

[3] JNCC Protected areas https://jncc.gov.uk/our-work/ukbi-c1-protected-areas/
[4] JNCC Protected aras https://jncc.gov.uk/our-work/ukbi-c1-protected-areas/
[5] Welsh Government Marine Protected Area Network https://gov.wales/marine-protected-area-network-management-framework-wales

Wales has MPAs covering 69% of inshore waters (up to 12 nautical miles)[6]. It is also understood that 50% of all Welsh waters[7] are within MPAs but this percentage figure is less well-documented. However, there have been significant concerns raised over the management of these sites[8]. As for land-based designations, monitoring data is limited. In January 2018, NRW reported that for inshore SACs and SPAs with marine features:[9]

- 46% of all features in Wales were assessed as in favourable condition, with the majority assessed with high confidence.
- 54% of features in Wales were assessed as in unfavourable condition, with around half assessed with high confidence.

How should the 30% target be defined on land?

In our view, Wales should aim to achieve at least 30% of land protected and well-managed for nature. This 30% target should not be seen as a ceiling but as a minimum required to contribute towards nature's recovery. We are in the midst of a biodiversity crisis, and ambitious measures and actions to address the scale of the challenge are critical. Scientific evidence demonstrates that protecting at least 30% of land can have a significant impact on extinction risk and on climate change[10]. But protecting land, by itself, will not recover nature if the land is not also being appropriately managed and monitored

In order to contribute towards a 30% by 2030 target, areas must meet two conditions:

1. **Protected for nature in the long-term**: the entirety of the 30% should be given long-term protection for nature and long-term protection against damage such as pollution, over-exploitation, invasive non-native species, habitat destruction and development.
2. **Well managed and in good or recovering condition**: It must all be regularly monitored at appropriate intervals as part of a programme of active management and investment. This monitoring should show clear evidence both of good management for nature and that the land is either in good condition for nature, or is showing demonstrable signs of ecological recovery. The management in place should be adaptable to changing ecological circumstances and may vary from highly species-specific and interventionist approaches to much more hands-off approaches.

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[6] Welsh Government Marine Protected Areas https://gov.wales/marine-protected-areas-0
[7] CCERA Committee Report on the Welsh Government's progress on Marine Protected Areas https://senedd.wales/laid%20documents/cr-ld12871/cr-ld12871%20-e.pdf
[8] CCERA Committee Report on the Welsh Government's progress on Marine Protected Areas https://senedd.wales/laid%20documents/cr-ld12871/cr-ld12871%20-e.pdf
[9] Welsh Government Indicative feature condition assessments for European marine sites https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/indicative-feature-condition-assessments-for-european-marine-sites-ems/?lang=en
[10] Journal of Applied Ecology Defining and delivering resilient ecological networks https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/1365-2664.13196

What should count towards the 30% target on land?

The 30% target could be met through enhancing the protection and management of SSSIs, SACs, SPAs and Ramsar sites; expanding the area covered by these designations; and improvements to the wider landscape designations to designations, provided that these meet our conditions of long-term protection and effective management for nature. Other sites or areas that demonstrably meet the conditions should also be included.

1. Areas with strict statutory protection on land

SSSIs should be considered the minimum level of protection needed to constitute "strict protection." In order to contribute to 30%, all sites must be monitored at appropriate intervals and in favourable condition or showing demonstrable signs of ecological recovery. The core of the 30% should be designated as SSSIs, SACs, SPAs or Ramsar sites.

At present only around 11% of land in Wales is protected as SSSI, SAC, SPA or Ramsar site and it is highly likely that many of these sites are not in a good condition for nature. No comprehensive data of the state of Wales' SSSIs has been published since 2006, but the Brecon Beacons National Park Nature Recovery Action Plan states that only 10% of SSSIs in the Park are under appropriate management and 55% of SSSIs are in unfavourable condition.[11]

To improve the condition of the protected sites network, which is one the five immediate priorities in the Government's Nature Recovery Action Plan for Wales, the Government should invest in a comprehensive monitoring and management programme, providing NRW with the resources necessary to regularly and robustly monitor sites and to use its statutory powers to secure appropriate management agreements. It should also undertake a programme of new designation to significantly increase the area of land protected as SSSIs, SACs, SPAs and Ramsar sites. As a first step, this should include implementing the recommendations of the 2001 and 2016 SPA Reviews.

Protecting land for nature also means effectively protecting it from damage resulting from wider off-site issues including pollution and habitat destruction. Many of the actions needed to address these issues have already been identified for SSSIs, SACs and SPAs, and Welsh Government should properly resource their implementation.

2. Reformed landscape designations on land

Approximately 25% of land in Wales is within designated landscapes (Areas of Outstanding Natural Beauty and National Parks). One of the statutory purposes of National Parks is to conserve and

[11] Brecon Beacons National Park Nature Recovery Plan 2019-24 https://www.beacons-npa.gov.uk/wp-content/uploads/BBNPA-Nature-Recovery-A4-ENG-WEB.pdf

enhance natural beauty[12], wildlife and cultural heritage, while AONBs are designated to conserve and enhance natural beauty. Although these landscapes have the potential to contribute significantly to the 30%, only those parts of them that meet the criteria of long-term protection, positive management for nature and good condition should count towards 30%.

For more land within the designated landscapes to contribute to the target, reforms must strengthen the protection for nature within them. Designated landscapes already contain high concentrations of sites with statutory nature designations, and as such should be important hubs for resilient ecological networks – restoring, creating and connecting habitats at scale, and for expansion of the statutory protected sites network. Existing protected sites in designated landscapes must also be brought into appropriate management.

Welsh Government's 2018 Valued and Resilient report recognised that further action is necessary in designated landscapes. It calls for them to become "exemplars for the sustainable management of natural resources, with the Authorities and partnerships championing action to halt the decline in biodiversity". The promise of new duties to pursue the sustainable management of natural resources in designated landscapes do not currently go far enough. In order for more of their area to count towards the 30% target, designated landscapes must be given significantly greater resource for nature recovery and a clear requirement to play a greater role in this.

3. Other sites or areas protected and managed for nature on land

Local Wildlife Sites form a significant natural resource of good quality or restorable habitats. A significant proportion of Local Wildlife Sites could be included in the 30% if they were given better protection, monitored and shown to be in good condition for nature or showing demonstrable signs of ecological recovery. Substantial investment is needed in Local Wildlife Site Partnerships to improve evidence of current condition and establish regular monitoring. The status of Local Wildlife Site designation should be reviewed to strengthen the long-term protection that they offer for nature. In practical terms, this would mean enhancing their protection in planning policy; and ensuring they are properly resourced to protect nature by providing dedicated funding and/or access to funding streams including the Sustainable Farm Scheme.

There are many other areas that could contribute to achieving the target. A robust process for assessing candidate areas should be established so that a broader range of sites can be recognised and included, providing they can demonstrate how they meet the two conditions outlined above. This could include: land under conservation covenants, National Nature Reserves (NNR), Important Plant Areas, Important Upland Bird Areas and Important Invertebrate Areas, Regionally Important Geological Sites (RIGS), irreplaceable habitats, land under long-term management agreements, land

[12] Natural beauty is defined as flora, fauna and geological and physiographical features

forming part of the Welsh National Forest and land owned by conservation NGOs, as long as it is designated or required to be protected, managed and monitored for nature.

How should the 30% target be defined at sea and what should count towards it?

Wales has already designated over 30% of Welsh seas within MPAs for specific features. However, MPA designation has been heavily skewed towards inshore sites. It is vital to ensure that areas of deeper water, which include different habitats and species, are also sufficiently protected. This could be addressed through designation of offshore MCZs and SPAs for foraging areas, for example.

Despite a high percentage of welsh seas existing within MPAs, many of these remain in unfavourable condition. Other legislative requirements, such as the requirement to achieve an ecologically-coherent network of MPAs under the Marine and Coastal Access Act (2009)[13], of which management is a crucial component, have not yet been achieved. In addition, the sufficiency of the SPA network (especially with regards to foraging areas for seabirds) also remains under question. In tandem, the Welsh Government and others failed to achieve Good Environmental Status[14] for seas by 31 December 2020, as required under the Marine Strategy Regulations (2010)[15]. It is therefore clear that a marine MPA targets are needed and that management should be central to a 2030 target for MPAs.

WEL suggest an appropriate target is:

By 2030, at least 30% of Wales' seas are within fully or highly protected MPAs, within the context of wider ecologically coherent networks. Furthermore, at least 10% of Wales' seas should be within areas fully protected by 2030. We refer to the terms fully and highly protected using the following definitions[16]:

- **Fully protected:** no extractive or destructive activities are allowed, and all impacts are minimized.
- **Highly protected:** only light extractive activities are allowed, and other impacts are minimized to the extent possible

At sea, there are currently no fully or highly protected MPAs in Wales. As such, this would require a change in management of some existing sites or designation of further MPAs.

[13] Marine and Coastal Access Act 2009 https://www.legislation.gov.uk/ukpga/2009/23/contents
[14] Marine Strategy Regulations 2010 https://www.legislation.gov.uk/uksi/2010/1627/schedule/1/made
[15] Marine Strategy Regulations 2010 https://www.legislation.gov.uk/uksi/2010/1627/contents/made
[16] Protected Plant Marine Protected Areas Guide https://www.protectedplanet.net/en/resources/mpa-guide

What needs to happen to achieve 30% by 2030 in Wales?

We set out below clear priorities for action to achieve the 2030 target. In line with the Natural Resources Policy[17], the top priority must be to better manage and improve the quality of existing sites, with action also needed to increase the area of designations and create more resilient ecological networks.

- **Set clear parameters; establish baseline extent and condition of existing areas; establish targets for favourable condition and implement regular reporting and monitoring**

It is vital that Welsh Government sets clear parameters based on our conditions for what will be included in the 30%, to ensure that it is counting only those areas that are is effectively managed and protected.

On land, the most urgent priority is to resource NRW to undertake a comprehensive programme of monitoring and condition assessment for statutory nature sites (SSSIs, SACs, SPAs and Ramsar sites) to quickly establish a robust baseline of the area currently protected and well-managed for nature. Site monitoring and condition data for Wales is outdated and inadequate and this must be remedied as a priority. Ongoing robust monitoring will inform management of these sites for nature and enable Welsh Government to track progress towards the 2030 target. We suggest setting a mid-way interim target or milestone would be appropriate as a key progress check.

To support achievement of the 30% by 2030 target, a specific target should be established for restoring statutory nature sites to favourable condition (supported by milestones and regular published reporting). Resource must be provided by Welsh Government to implement the actions needed to achieve favourable condition.

As on land, much more needs to be done to ensure protected areas at sea are properly monitored and assessed. For example, indicative condition assessments have highlighted that the status of some MPA features remains unknown. The Welsh Government should also conduct an assessment of its existing MPA network to determine where highly/fully protected sites (new MPAs or further designations) would make the greatest contribution to marine biodiversity. As a minimum, Welsh Government need to adhere to existing legislation, actively managing (and where necessary stopping) activities within MPAs to ensure they are compatible with the conservation objectives of the site. In this context, reviews of existing management measures are needed to identify the pressures and threats causing unfavourable condition so that these can be addressed. The precautionary principle must be used where needed.

[17] Welsh Government Natural Resources Policy 2017 https://gov.wales/sites/default/files/publications/2019-06/natural-resources-policy.pdf

- **Strengthen existing designations and provide strict protection for nature's last enclaves**

On land, existing designations including Local Wildlife Sites and National Nature Reserves should be strengthened to ensure that they that they provide protection for nature that meets the conditions necessary to be counted towards the 30%. SSSI designation provides protection from harms such as development, and this must be robustly applied. NRW has powers to make management agreements for SSSIs and other areas of land[18]. NRW should be resourced so that it can make use of these powers wherever appropriate, making a major contribution to restoring these sites and increasing the area of land that can count to the 30%. This is of relevance to those SSSIs that are terrestrial and those which are coastal (considered to be MPAs as well).

In Wales, many important remnants of habitats such as ancient woodlands and species-rich grasslands remain under-protected. The Welsh Government should identify the most important areas of ancient soils, long ecological continuity and significant wildlife populations, and remaining fragments of irreplaceable habitat, irrespective of its current condition. These areas represent opportunities to add to the existing sites network and should be given the highest levels of protection in recognition of their scarcity, vulnerability and value for nature.

Criterion for Ecologically and Biologically Significant Areas (EBSAs) have been established within the Convention on Biological Diversity (CBD) for sites with (for example) high uniqueness or rarity, biological productivity or naturalness both for benthic and pelagic marine features. The inclusion and strict protection of sites that are important for high biodiversity (benthic or pelagic), uniqueness or naturalness in the MPA networks in Wales would maximise ecological benefits. An immediate opportunity to do so is through the MCZ designation process. This should also form a key consideration in an assessment of the best opportunities for highly/fully protected MPAs in Wales.

- **Plan strategically for expansion of the protected site network in line with evidence-based ecological principles**

NRW must be resourced to take action to improve the protected site network in Wales, including increasing the area designated. The SSSI selection process should be inclusive and comprehensive, rather than the current approach which aims only to designate a representative sample of sites. Instead, all sites that meet the guidelines should be designated as SSSIs.

Expansion of the protected site network should be informed by evidence-based principles to deliver maximum benefits for nature and people. Connectivity and habitat networks will be key

[18] Section 16 of the Environment (Wales) Act provides that *NRW may make an agreement with a person who has an interest in land in Wales about the management of use of the land, if so doing appears to it to promote the achievement of any objective it has in the exercise of its functions.*

considerations to provide resilience and enable wildlife to move through the landscape. Government must set targets and introduce policies that will support and increase connectivity and ecological resilience and ensure that these are reflected in Area Statements.

The 30% of land protected for nature should be supported by a wider matrix of sustainable land management, with for example the new Welsh Sustainable Farming Scheme playing an important role in achieving wider nature recovery across the entirety of Wales.

At sea, work remains to designate Marine Conservation Zones (including sites for mobile species) and to review the sufficiency of the SPA network. Criteria for protecting areas of high biodiversity (benthic or pelagic), uniqueness or naturalness should not be forgotten and addressing depth imbalances in the network should be a key priority. Concurrently, opportunities to establish highly or fully protected sites should be assessed and acted upon. Resourcing for NRW and the Welsh Government's Marine Ecosystem and Biodiversity team, which has so often been under-resourced, will be vital.

Conclusion

Protecting and effectively managing 30% of land and 30% of sea for nature would help to restore habitats and wildlife populations and has significant co-benefits for climate and people. To be included in the 30x30 target, land and seas should be subject to long-term protection, regularly monitored and well-managed for nature. This target should be maintained and extended beyond 2030 to promote nature's recovery; and should sit alongside measures to strengthen the network for nature in the wider landscape of Wales.

On land, the extent of existing protected areas in Wales that currently meet the criteria we have set out is small, but the potential is considerable. At sea, designations cover a much larger area but much more needs to be done to ensure that these sites safeguard marine biodiversity. By strictly protecting Wales' last remaining natural habitats (including highly and fully protected sites at sea), modernising existing designations on land to focus on nature and strengthen protection, and identifying a range of new areas most important for nature's recovery, delivery of the 30 by 30 commitment can help to reverse the long-term decline of wildlife in Wales and set us on the path to a nature-positive economy.

Wales Environment Link (WEL) is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales. WEL is a respected intermediary body connecting the government and the environmental NGO sector. Our vision is a thriving Welsh environment for future generations.

This paper represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.

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