Cyswllt Amgylchedd Cymru | Wales Environment Link

Julie James
Minister for Climate Change
Welsh Government
Tŷ Hywel
Cardiff Bay
CF99 1NA

Cc: Lee Waters, Deputy Minister for Climate Change

3 March | 2022

Dear Minister

Biodiversity Deep Dive – Wales Environment Link Recommendations

The Government's decision to undertake a 'deep dive' on biodiversity is strongly welcomed by Wales Environment Link members. Wales, like the rest of the world, is suffering from biodiversity collapse and this is a critical decade to halt the loss and begin its restoration. As the Government finalises its contribution to the CBD COP15 it is our hope that this deep dive will provide the emphasis and Ministerial weight required to drive change throughout government and beyond.

This work will need to recognise that climate change and biodiversity loss are two sides of the same coin and need to be tackled together. This deep dive will have an important role in informing Wales' plan to deliver Net Zero. It will also need to recognise that there is a perception that climate change investments and actions will in themselves address the nature crisis. Although well-planned actions that consider both decarbonisation and nature objectives will help, specific nature-focused actions will be urgently needed particularly to avoid the extinction of species across Wales. To support the Government's design of the deep dive, this contribution makes several recommendations that address both the structural and practical obstacles which currently prevent the creation of a nature positive pathway through 2030 and into the foreseeable future.

This pathway must build upon previous efforts to restructure and re-prioritise government thinking on biodiversity from the Environment (Wales) Act 2016, through the Environmental Growth work of 2019, to the ongoing development of the Nature Networks Fund and Sustainable Farming Scheme. It is only through the combined efforts of these and additional programmes that Wales stands a chance of delivering against its commitment to nature's recovery – including a 'nature positive' target to halt and begin to reverse biodiversity loss by 2030, a 30x30 target and wider Net Zero commitments in response to the nature and climate emergency.

We recommend that the deep dive be framed in particular around how to achieve ambitious targets for the restoration of nature through a viable and funded plan. To deliver on ambitious targets we need to both stop the loss of nature and also protect what we still have. We also need to deliver restoration and recovery at scale and pace keeping common species common as well as taking action to reverse the decline of species on the brink of extinction. In addition, we need to urgently restore natural processes at scale across the landscape.

Structural Obstacles

The following points identify structural obstacles that currently prevent effective action to halt and reverse biodiversity decline. We recommend that the deep dive further investigates these points with a view to overcoming them.

- Wales remains data deficient with regards to biodiversity. On land, while we have enough information to assess some general trends and to begin to report against high level targets, we need to increase monitoring and research to improve our knowledge of the state of nature and to evidence clear cause and effect relationships between specific interventions (both positive and negative) and their impact on biodiversity [1]. Nevertheless, the work Wales has done in this area, while constrained in scope and resourcing, has been helpful in noting specific relationships – most notably the work of Environment and Rural Affairs Monitoring and Modelling Programme (ERAMMP). If Wales is going to become more effective at identifying, enacting, and assessing practical biodiversity restoration efforts it needs to expand monitoring effort and resources such as ERAMMP so they are more able to provide the evidence policymakers require

to justify and mandate specific actions. Additions could include the expanded monitoring of HNV type 3 farmland given its role in rare species support and the inclusion of specific key species monitoring in its agri-environmental monitoring (rather than depending on generalist trends). Better monitoring of protected sites, land and sea, is also critically needed to enable us to understand how species and habitats are faring in Wales. In the marine environment, data is more scarce. Welsh Government has defined high level evidence priorities in the Marine Evidence Strategy and NRW have outlined priority evidence needs along with collaborative research ideas. However, many high priority evidence needs are lacking funding to take them forward. To effectively manage our marine environment, it is imperative that we continue to prioritise and build the evidence base to support management decisions.

- Since its establishment it has been found by UncheckedUK that the Welsh Government has reduced Natural Resources Wales' budget by 35%. This decision has seen a significant reduction in NRW's ability to conduct its functions effectively – even at core/statutory levels. This pressure has been added to by the additional regulatory requirements that have been placed on them during the same period. As a result, it is now a sad reality across Wales that, for example, biodiversity depleting pollution events often go unassessed and unpunished. This needs to change or critical regulations such as the Control of Agricultural Pollution or requirements within the forthcoming Sustainable Farming Scheme will be rendered largely political exercises. In addition, recently published results have shown a large proportion of Wales' protected sites (land and sea) are not in favourable condition and it is clear NRW does not have staff capacity to deliver effective monitoring and secure appropriate management of sites. To address this, we recommend that the deep dive identifies the annual cost of effective monitoring and enforcement of existing statutory functions (including protected sites management) to NRW and recommend that the Welsh Government commits to fulfilling this in a separate and additional payment to the NRW block grant. The deep dive should explore the requirement for this number to be adjusted to match the additional burden of new regulations as the Senedd creates them.

- There is significant confusion over the practical meaning of the Sustainable Management of Natural Resources (SMNR) in the Environment (Wales) Act 2016. Attempts to clarify through guidance have not yet provided sufficient explanation, and it is our impression from extensive discussions with officials and those affected that the positive impact of the legislation has been disappointingly muted. It is our assessment that part of this problem can be addressed through the Welsh Government's recent commitment to statutory nature targets which enable the abstract SMNR duty and principles to be attached to specific actions which can be demonstrated to support target obtainment. The deep dive should explore how nature targets can be designed to best interface with the SMNR duty and principles to achieve this, ensuring a shared understanding of requirements and responsibilities. In making this suggestion we are not suggesting the need to reopen and amend the Act.

Practical Obstacles

The following points identify some of the practical obstacles that currently prevent effective action to halt and reverse biodiversity decline. We recommend that the deep dive further investigates how the Welsh Government can take specific action to overcome them.

- We need to gain the same recognition of the nature crisis as has been achieved with the Climate Crisis. There is a need to raise awareness and therefore gain public support to increase investment in restoring nature across Wales. As with Climate Change not investing now will only increase future costs to restore nature

- Welsh agricultural intensification has been repeatedly identified as a primary driver of biodiversity loss. The development of a Sustainable Farming Scheme (SFS) to replace the Common Agricultural Policy is a much-needed opportunity for extensive reform to bring Welsh agriculture back within environmental limits. This should include, among other things, addressing pesticides use; overstocking; pollution risk; carbon sequestration; and our export driven production practices. We recommend that the deep dive considers the nature benefit of using the SFS to transition to an all Wales agro-ecological and

regenerative farming system.

- How can nature's recovery across public functions be significantly improved to secure biodiversity-rich nature based solutions or green infrastructure at greater scale and pace? For example, a significant amount of the flood defence budget is spent on hard engineering and although some safeguarding structures need to be maintained there is a lack of willingness to invest in re-wetting the land. Engineers and practitioners need to increase their eco-literacy and embrace solutions such as re-wetting uplands, increasing tree and vegetation cover on slopes, re-aligning rivers to their natural flow and re-instating flood plains. Such approaches will enable the issue of flooding to be fully addressed and at a cheaper cost than carbon heavy hard engineering.

- The majority of Wales' protected areas remain in poor condition as a result of chronic underfunding and competing management priorities. Many protected areas in Wales cover very large areas of land and sea which could deliver significant ecosystem services. Yet at the moment the full potential of these protected areas is not being realised. The underlying reasons for this need to be examined and solutions explored. The recent Nature Networks fund has the potential to start addressing this. Yet the deep dive needs to be more ambitious. It should consider how this action can be accelerated and expanded to include a funded habitat restoration network map which sets out a vision to join up all of these sites, National Forest sites, Marine Protected Areas, and other designated sites through nature rich management plans. It should also consider how the mission and Management Plans of protected landscapes, that is National Parks and AONBs, can be strengthened to ensure that these areas are making a greater contribution to nature's recovery. Species recovery must be built into land and sea management approaches (including habitat creation or recovery at scale), to prevent extinctions and ensure we are delivering quality (biodiversity, condition) as well as extent of habitat.

- The rate of Welsh peatland restoration is perilously slow. At the current rate, it would take over 100 years to restore all the peatlands across Wales. The scale and pace of restoration needs to change if the nature and climate crisis is to be properly addressed. Peat has an enormous potential to restore nature;

sequester carbon; and connect habitats/protected sites. The deep dive should consider what actions can be taken to dramatically accelerate our peatland restoration rate up to 2030. Further, Wales as a globally responsible nation can lead the way on implementing a complete ban on the use of peat in horticulture, thereby protecting peatlands in the UK and across Europe.

- Recently, there has been an increased awareness and effort to restore lost coastal and marine habitats, as well as the need to properly protect and manage the remaining areas of habitats we have. For example, seagrass beds in the UK have declined by up to 90% in the last few centuries. One barrier to the restoration of coastal habitats is the current licensing and consenting process, with many conservation efforts struggling, and potentially faltering due to the cost, time and level of expertise needed to navigate the licensing process. The deep dive should consider how positive conservation actions can better be encouraged and facilitated e.g. including restoration areas in Marine Spatial Planning, the licensing process, as well as tackling systemic issues such as water quality that impact the ability of marine habitats to recover.

- We consistently under-invest in the understanding and management of our marine environment. The deep dive should examine how we both avoid putting further pressure on already degraded marine ecosystems and actively enable their recovery. One area of significant concern is the deployment of renewable energy in areas where the negative impacts on nature could be significant. We should not be trading off gains for the climate with additional losses for nature. The deep dive must consider the role of marine planning to not only direct new developments to the least damaging locations, but also consider how to reduce cumulative anthropogenic pressures on already degraded habitats.

- Woodland as an example of where there is robust official data showing that only 9% of all native woodland in Wales is in favourable condition [2]. 30% of all woodland in Wales is owned by the Welsh Government and managed by NRW. The ecological condition of woodland and tree cover outside woods continues to decline, despite the UK Forest Standard (UKFS), which does not require any effective plan to address this.

We wish you well with the deep dive. WEL and its member organisations are keen to assist in any way we can. Please do contact us if we can help in any way.

Yours sincerely

Annie Smith
Chair of Wales Environment Link's Biodiversity Policy Working Group

[1] In making this point it is critical to stress that some of these relationships will be too complex to be knowable in the same way as other policy areas – for example we can't simply project where a species of habitat will be, or what we'll need to do to support it in twenty years like we can a road network or a population trend. Supported by all members of Wales Environment Link

[2] National Forest Inventory Ecological condition assessment
https://www.forestresearch.gov.uk/documents/7552/FR_NFI_Condition_Scoring_Results_Wales_cxZEeL5.pdf
From key findings:
"… 9% of native woodland area in Wales is in favourable condition"
"2% of non-native woodland area in Wales is in favourable condition"
Detailed statistics
https://www.forestresearch.gov.uk/documents/7541/FR_NFI_WEC_Statistics_Wales.pdf

Swyddfa Caerdydd
Tramshed Tech
Uned D, Stryd Pendyris Caerdydd CF11 6BH
F: 07498 228066 | E: enquiry@waleslink.org
Trydar: @WalesLink

Cardiff Office
Tramshed Tech
Unit D, Pendyris Street, Cardiff CF11 6BH
T: 07498 228066 | E: enquiry@waleslink.org
Twitter: @WalesLink

www.waleslink.org

Cadeirydd | Chair: Roger Thomas. Cyf-Gyfarwyddwyr | Joint Directors: Susan Evans and Karen Whitfield.
Rhif Elusen Gofrestredig | Registered Charity Number: 1022675