

Consultation response: National Milestones

September 2022

Milestone 8: Biodiversity

Wales Environment Link (WEL) welcomes the development of this further suite of national milestones to help ministers assess progress towards achieving the well-being goals set out in the Well-being of Future Generations (Wales) Act 2015. Our comments in this response are focused on Milestone #8, the milestone for Indicator 44 (Status of biological diversity in Wales). We welcome the proposal and ambition for such a milestone, while fully recognising the complexity involved in measuring biological diversity.

We consider that Milestone #8 is relevant across all eight National Well-being Goals, including Goal 3 (Healthier) and Goal 4 (More Equal) which are currently not included in the assessment of Goals that this Milestone is relevant to. Access to high quality and biodiverse ecosystems can make a significant contribution to physical and mental health and wellbeing, and such access should be available to everyone as a key component of social and environmental justice.

The proposed Milestone #8 sets absolutely the right level of ambition in terms of the need to halt and start to reverse biodiversity loss by 2030 and achieve full recovery by 2050. This is in alignment with proposals for a Nature Positive Global Goal to be adopted at the COP15 summit in December 2022. However, it is vital that progress towards the milestone is measured in a sufficient and meaningful way, to ensure that assessment of progress is as well informed and accurate as possible. Measuring progress towards this milestone using the current experimental Indicator 44 would run the risk of over-simplification. The milestone makes reference to “species and ecosystems”, yet Indicator 44 currently measures only one partial part of the picture for species (distribution of priority species) and there is no indication that Indicator 43 (areas of healthy ecosystem in Wales) would feed in to assessing progress against the proposed milestone.

We note that Indicator 44 is currently presented as an experimental indicator and it appears that this experimental status can, in theory, continue indefinitely. We would welcome assurance that the Welsh Government will continue work to improve and refine this indicator, which currently incorporates data from a relatively small number of species (113) representing a very limited range of taxa (invertebrates, bryophytes and lichens). Without further development or additional context, the indicator as it currently stands is insufficient for the purpose of measuring the status of biological diversity in Wales and tracking progress towards the proposed Milestone #8.

The Welsh Government has committed to bringing forward legally binding targets for nature recovery informed by the context of the global biodiversity framework of international goals and targets set to be agreed at the CBP COP15 summit in December. To date, the Welsh Government has declined to give a timetable for setting these targets, despite other UK countries having already set such targets in legislation or being in the process of doing so. We consider that a suite of targets and indicators that includes (but is not limited to) distribution, abundance and extinction risk of species, and quality and extent of habitats, is essential to drive action and measure progress towards the goal of halting and starting to reverse biodiversity loss by 2030.

We wish it to be made clear that the proposed Milestone #8 would in no way be a substitute or stop-gap for the legally binding nature recovery targets that are needed. National milestones are not supported by specific delivery requirements and do not provide the level of accountability needed to drive progress. Indeed, the Future Generations Commissioner has specifically recommended that the Welsh Government should set statutory targets for nature's recovery as part of addressing the inadequate attention given to environment under the Resilient Wales goal to date.

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.



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