Cyswllt Amgylchedd Cymru | Wales Environment Link

Just Transition to Net Zero Wales

March 2023

Summary

The consultation document introduces this subject with the startling "with less than ten years left to avoid a climate system breakdown […] the need to decarbonise our economies has never been more urgent." We would like to echo the urgency of transition in our paper, as we cannot afford to rely on small steps or behavioural nudges to avoid climate catastrophe. We also emphasise that a transition will not be just if it only focuses on carbon and does not protect and enhance biodiversity.

We need the Welsh Government to take a lead on deliberately changing our economy to one that meets the needs of addressing the dual climate and nature crises. However, such interventions will not be effective or sustainable if they disadvantage people, groups or sectors through a lack of planning or consultation. We cannot continue to fund unsustainable sectors or incentivise polluting industries. The climate and nature crises are entwined and there are many opportunities that Wales, as a small country with wellbeing, ecosystems and sustainability at the heart of its legislation, should be able to carry out.

Questions

Governance

1. Do you have any evidence to show how the Well-being of Future Generations (Wales) Act 2015 has, or could be, used to inform a just transition?

The WFG Act has helped to change the way public sector bodies work, but its impact is less in the private sector. We need to ensure the Act's Wellbeing Goals and Ways of Working truly extend to the private sector; with the Welsh Government's support for a business reliant on the way they operate sustainably.

One way to ensure this would be to upgrade the Commissioner's powers and functions to include real enforcement, as well as ensure the Commissioner's office is adequately resourced in order to fulfil such extra functions. Currently, they can advise and recommend and monitor a (public) body, but there is no real enforcement or regulation that they can enact. Therefore, the Act only has limited scope in how it can be extended further, and it still only has real influence when it comes to the public sector. As we are at a point of transition in the Future Generations Office, with the Commissioner changing after the first 7-year appointment, this seems a good time to review its functioning and impact.

The Act provides a clear framework for the governance of the Just Transition, and this could be further enhanced by the incorporation of the rights-based approach. Utilising the body of international law of human rights can ensure that as we transition to Net Zero, Government, businesses, and individuals take responsibility for ensuring peoples rights are respected. For the government, this means enacting and enforcing restrictions on fossil fuels, protecting endangered species and spaces with effective legislation and regulation, funding ecological restoration, phasing out and better regulating extractive industries, requiring businesses to carry out human rights and environmental due diligence across supply chains, ending subsidies encouraging activities that degrade ecosystems, and shifting to sustainable production and consumption, including via the transition to the circular economy.

A rights-based approach means listening to everyone's voices and ensuring that the people whose lives, health and rights could be affected by a proposed action have a seat at the table where decisions are made. This approach focuses on the most vulnerable and disadvantaged populations and ensures accountability.

We would also be remiss to not highlight the continuing lack of an oversight body that has environmental protection of Wales as its purpose; the current Interim Assessor has no enforcement powers. This is a huge governance gap still left after the UK left the European Union, and with the Retained EU Law Bill expected to pass, despite the Welsh Government's objections, Wales will no longer be subject to Directives that help protect our water, birds and habitats. One of the best things the Welsh Government could do for a just transition, is to ensure there is an Assessor – supported by a well-resourced office – who can truly have oversight of the

implementation and enforcement of environmental law to ensure economic decision making does not adversely impact upon the climate and nature, and can bring forward fines, statutory advice and Welsh Ministers' intervention where required.

2. What examples do you have of decision-making processes or guiding principles that could be used across public, private and third sectors to plan for and ensure a just transition?

Stemming from the Wellbeing Goals, the Economic Contract that Welsh Ministers instated "is a commitment to provide public investment that prioritises the social and environmental needs of Wales whilst building a more resilient and prosperous wellbeing economy". It is "not directly linked to funding", which is a shame, but is strongly encouraged for a business seeking direct financial support from Welsh Government. Welsh Ministers should be using their financial levers, alongside other nudges, to enact behaviour change in business.

Alongside Economic Strength and Adaptability, Fair Work and Promotion of Wellbeing, a fourth strand of the Contract sets out that businesses must demonstrate commitment and action to being Low Carbon and Climate Resilient. It states: "A low carbon, climate resilient business is one which takes positive action to minimise and reduce carbon emissions, build resilience and respond to the threats and opportunities from the impacts of climate change by adapting business practices for the future."

These kinds of policies are welcome and seem to be more prevalent since the WFG Act. This could be built upon with further commitments, and more concrete actions rather than just pledges, to ensure they are implemented and monitored. They could have assistance from a business-specialist climate team in Welsh Government, that shows them how to increase sustainability from the point of view of just transition, like retraining workers, making buildings more efficient, ensuring processes do not pollute and keeping nature in mind when planning land management or taking on new acquisitions; i.e. a housing developer should ensure they do not build on flood plains, have efficient homes, and make sure the surrounding estate is nature positive and wildlife-friendly, with as small a carbon impact as a construction-based business can allow. Additionally, they could commit to '20-minute neighbourhood' concepts,

where local services and transport provision is guaranteed in the planning process. This is one way that decision-making processes could instigate more rapid change.

The same could go for the third sector, for example, in enabling expertise into public and private processes. In terms of land management, many wildlife specialist charities could be recruited to help with farming advice via Farming Connect, to help relieve pressure on Natural Resources Wales as the ultimate advisor, regulator and arbiter of whether sustainable farming is taking place. With more input, it would help farmers to create a business-friendly path forward that also enhances the land, increases their potential for a sustainable farming business, and creates profit and economic gain for the local area. The same should go for marine planning, as outlined later in our asks for a Marine Development Plan.

However, we do welcome the Welsh Government's reminders to Planning Authorities that they need to align with national policies and commitments on biodiversity in their local decision making, such as the letter the Minister for Climate Change sent to Chief Planning Officers in December 2022.

We also very much welcomed the Welsh Government's decision last month to revise the way they build and invest in road networks. Particularly the Review Panel's recommendations that future road projects should reduce carbon emissions, or provides connections that maximises the use of sustainable modes of transport, and that no new project should "adversely affect ecologically valuable sites". This seems to follow the principles set by the First Minister's decision to not build the M4 relief road, and it's this kind of decision making – with clear principles set on how future decisions should be made – that put Wales on the path to Net Zero.

The Scottish Government provides a good example of guiding principles in their response to their own Just Transition Commission. They set out that it would be guided by:

- Skills, training and education that helps to secure good, high-value jobs in green industries like low-carbon manufacturing, renewables, and tech.
- Job security for those in industries that will play the biggest part in the transition – at every level – from those working in petrol stations to those on oil platforms.

- Homes that are energy efficient and help to reduce fuel poverty.
- Building infrastructure, transport and communities that support efforts to decarbonise, enhance biodiversity and which are resilient in the face of the impact of climate change that we are already feeling.
- Making sure the costs do not burden those least able to pay and the benefits of our transition are felt regardless of where you live, who you are and what you do.

3. Do you have any evidence on how we can best fulfil the public sector equality duty in pursuing a just transition?

In June 2020, Vivid Economics published a short report for WWF UK – A UK Investment Strategy: Building Back a Resilient And Sustainable Economy – following on from their more comprehensive report on required investment to reach net zero. At the time of publishing, they stated that their review of global government investment responses to Covid-19 showed that "only 11% of government spending is going towards businesses with a track record of positive environmental performance and programs that pursue environmental goals." Both of their reports have showed that investment in sustainable jobs and sectors can bring significant benefits to the UK economy.

If the equality duty is to be met, we need better investment in a green recovery that focuses on ensuring those in non-sustainable industries are not left behind. Funding opportunities to re-train, upskill and start their own business after redundancy all help to ensure they are not left behind. Involving trade unions would be essential here. The UK Government's report from its Green Jobs Task Force – entitled The Ten Point Plan for a Green Industrial Revolution – sets out sector areas we need to advance, which can help with more granular analysis of what jobs will be lost and what will be created. These include: electric vehicles, active travel management, renewable energy, retrofitting, carbon capture and storage, green finance and advancing nuclear power as a 'cleaner' and low carbon form of energy. Rolling out community-owned and small-scale renewables, in areas proven to be not detrimental to nature, is the easiest form of investment for Welsh Government – who still only have powers up to 350MW (or just 1MW at sea) in terms of granting planning permission – than large-scale infrastructure. We are hopeful that the plans

for a nationally owned energy company might also take into account how to both supply and create energy for local communities at an affordable rate, particularly in light of the current cost of living crisis. This would go some way to addressing a just transition

A recent article, from the World Bank Climate Change Group, discusses gender and transition. They highlight that women are underrepresented in high potential climate-friendly sectors – such as low-carbon transport and green construction – and in existing areas, women make up only 32% of the renewable energy workforce and represent only 23% of managers in water utilities. However, "women are more concentrated in climate-vulnerable sectors. It is estimated that women make up 48% of the global agricultural workforce – up to 69% in South Asia". Conversely, only 15% of full time workers in the fishing and aquaculture sector were female in 2020, indicating that women tend to have more unstable positions in this area.

It's interesting to note how gender plays a part in the environmental economy, and the Future Generations Commissioner has highlighted there are similar findings across other diversity characteristics, particularly ethnic diversity. We need to take into account retraining workers currently in unsustainable sectors who might find it much harder to access retraining or find it daunting to change sector entirely, and will need public sector support to re-engage with a new job or business.

Impacts and Opportunities

4. What evidence do you have on the main impacts and opportunities associated with meeting Wales's transition to net zero? Please provide evidence (or identify evidence gaps) for the short (2022 to 2025), medium (2026 to 2035) and long term (2036 to 2050).

The Welsh Government's has already committed to end the sale of peat for retail purposes; this is a welcome step forward towards reaching net zero and protecting peatlands in other countries. Furthermore, the ban on peat use presents a critical opportunity for the horticultural industry to shift towards more sustainable operations, production, and supply chains across the board. Simply replacing peat with other unsustainably sourced raw materials would be a missed opportunity for an industry-wide transformation towards a more climate-friendly operation. Despite

centring around plants, the horticultural trade is not a ‘green’ sector in practice; it has significant impacts in terms of single-use plastics, waste, energy use, and chemical inputs. Manufacturers and retailers can drive a shift in consumer attitude towards ‘greener’ gardening, contributing to net zero through the promotion of natural fertilisers and pest controls, home composting, planting of native species, support for pollinators and other wildlife, and the encouragement of perennial gardens rather than bought-in annual bedding plants.

Amended regulation is required to allow alternative materials such an anaerobic digestate, wood fibre and green waste to be reprocessed as growing media, along with support to ensure a just transition within the horticulture industry. Local processing of compostable waste from gardens and kitchens would generate jobs, reduce the requirement for peat, reduce waste going to landfill and move us closer towards the principles of the circular economy. As such, banning the trade in peat marks an opportunity to move towards greener gardening and a horticulture industry which works for net zero and with nature, not against it - a move which will guarantee the industry’s own sustainability in the long term.

There are also opportunities for job creation in rural areas by seizing momentum to a greener economy, such as in employing people who understand land management that restores bogs, creates woodland, and transitions us to more sustainable food production.

The Agriculture Bill presents a significant opportunity to implement a just transition for agriculture over the course of the next five years. To ensure the Bill enables this, and to prevent further complicated reviews of the scheme in the short to medium term, sustainable development should be incorporated within the legislation from the start. It should include a duty to ensure that the sustainable land management objectives are delivered together, with no single objective being allowed to be prioritised or ignored.. The Bill should also introduce a robust baseline for standards via a duty on government to set National Minimum Standards (NMS) in time for the launch for the Sustainable Farming Scheme. This would provide clarity to farmers regarding the Welsh Government’s expectations, enabling equitable involvement with the scheme, and demonstrating the Welsh Government’s commitments to upholding strong environmental standards for climate and for nature.

A key opportunity of the transition is the chance to shift to an agroecological food system. Agroecology is a science, a practice, and a movement which improves the food and farming system, supports regenerative farming, and puts people – farmers, food producers, citizens – at the heart of nature positive solutions. The move to agroecology is critical if we are to address the climate and nature emergencies and the corresponding cost of living crisis in an equitable and just way. In contrast to the present system, agroecological farming practice rely on fostering healthy and diverse ecosystems as the foundations for farming, without damaging practices like pesticides, or heavy fertiliser input. Without the reliance on external inputs, farms are consistently shown to be more resilient economically and environmentally, reducing dependency on other areas of the world for food production and decreasing the global injustices associated with this method of producing and supplying food. Crucially, agroecology connects food production to food distribution.

The design and implementation of the Scheme also presents a huge opportunity for farmers and land managers to be supported to manage habitats for climate and nature benefits, alongside sustainably producing food. For example, permanent grassland covers nearly two thirds of the land in Wales, although only 9% of the land is semi-natural grassland, as opposed to the majority being agriculturally 'improved' pasture that's had fertilisers added and has been ploughed, which can reduce biodiversity and release carbon stored in the soil into the atmosphere. Semi-natural grasslands store more carbon than agriculturally improved pasture or arable land. This may be due to the less intensive management practices, greater plant species richness, and the undisturbed soils of semi-natural grasslands. Supporting and paying land managers to restore and maintain their permanent, semi-natural pastures, in tandem with producing sustainable food in the long term, is a huge opportunity for climate change mitigation and adaptation, as part of a just transition to net zero.

Shifting to a sustainable diet is also a crucial aspect of the transition, and must be tackled via policy intervention, and vehicles like a Community Food Strategy may present an opportunity to shift Welsh people towards consuming Welsh food. However, this will not be possible if horticulture remains on such a small scale, and if communities cannot access local food due to lack of infrastructure, transport, or resources to do so. Therefore, in order to ensure a just and sustainable transition for

agriculture, the Welsh Government must make policy interventions to enact change along the supply chain, encourage horticulture production, and encourage sustainable diets. This policy must strengthen the links between domestic food production and consumption in a way that also enables land to meet competing societal demands across all the major land uses – food, nature, housing, climate change mitigation and adaptation, infrastructure etc. A land use framework would provide a strategic steer on land use, to deliver across government targets and societal needs in a joined-up way. The Environment (Wales) Act 2016 and the Planning (Wales) Act 2015 offer an outline framework but the policy tools that they offer are not fully developed and working effectively together.

Taking steps to tackle health problems at the source via healthy, nutritious diets will enable long term prevention of health challenges. Although in the short term, this may create additional costs, in the long term, the health benefits of supporting dietary shift and developing an accessible local food system (perhaps by ensuring communities can access food infrastructure via active travel methods) would create costs savings for the NHS, which currently spends an estimated £6.1 billion annually on diet-related illness and obesity. This would also be in line with the preventative approach to health and could be embedded via lifelong learning programmes and community support.

5. Do you have any evidence to show what the well-being benefits and challenges for each sector could be?

The WWF Cymru report, a Welsh Food System Fit for Future Generations demonstrates there are significant wellbeing benefits to be had in transitioning agriculture to Net Zero. For example, “an agroecological approach to soil health would be one which focuses upon natural inputs and their retention. The diversity of practices within an agroecological system creates a more robust and resilient system that is less vulnerable to international market dynamics.” Supporting farmers to transition to agroecological systems is integral to ensure a just and fair transition for the sector.

Furthermore, sustainable local and regional public procurement would create markets for local food businesses. Including public value criteria around

environmental, welfare, and nutritional standards in food production within public service board wellbeing plans could bring financial and health benefits to farmers and to the local community.

Creating a more localised food system in Wales and supporting a diverse range of farming types and sizes, and practicing regenerative principles will improve food security by creating a more resilient ecosystem, which is the fundamental basis to a healthy farming sector, food and ultimately human health. Reducing our reliance on food from abroad will also improve food security, and have a positive impact on global responsibility by reducing our vulnerability to global price spikes.

There are challenges to the delivery of a just transition. Agroecological approaches to farming are intensive, knowledge-based and context-specific processes – even if they are the more sustainable approach – and any lack of available skills or resources to provide support to those working in the sector to make changes to their farms will pose a great risk for the future of these businesses. The shift to the sustainable farming system will require the support of advisors who are highly educated in understanding farming businesses and the communities in which they exist, as well as in environmentally sound, nature friendly land management practices, and how individual farms, with landscape specific issues (i.e. degraded soil, presence of peatlands, enhancing forests, creating hedgerows, diversifying crops) will utilise practices and processes to implement sustainable development on their farm.

The transition must offer socially just and equitable opportunities for farmers and land workers – support systems for farmers are integral to the delivery of this. Without them, farmers are vulnerable to further economic difficulty and delivery of sustainable land management is put at risk.

The Welsh Government must review services like Farming Connect and consider how it will cope with the increase in demand for knowledge sharing. Expecting farmers to shift to sustainable land management without providing adequate, accessible, and timely support risks poor uptake and risks farmers losing business, in turn risking the communities and the nature they serve.

6. What evidence do you have on how transition in one sector may either accentuate or diminish a risk or opportunity in another sector?

There are obvious trade-offs, with jobs in unsustainable energy – like oil and coal – being lost but others being created in renewable sectors. This is why it's important that Welsh Government opens up opportunities for re-training of employees, and not just new entrants or young people, so that no one loses out altogether by their field becoming unviable.

Increased growth in nature positive renewable energy could potentially use levies on energy companies to fund the training, re-skilling or necessary adjustments to displaced activities - to ensure they are modernised, not lost – and we can transition to low carbon and sustainable ways of generating, distributing and using power.

We should also be mindful that deploying nature-sensitive renewables does not have to mean a loss of habitat, and we can again look at good practice in Scotland with Scottish Renewables highlighting how wind farms have also been restoring various peatland habitats. Best practice needs to be shared and adopted as much as possible.

7. What evidence do you have on the spatial impacts and opportunities across Wales?

Welsh waters hold huge opportunity for offshore renewable energy production. However, we need to ensure that in transitioning to a much-needed low-carbon energy supply, we carefully manage this adding of an additional pressure on top of already-degraded marine ecosystems. The spatial impacts on those who already depend on the sea for livelihoods will also be felt (e.g. fishing displacement at sea and coastal squeeze impacting on coastal communities). Space must be managed carefully to allow all sectors to operate whilst protecting and enhancing the marine environment.

The Welsh National Marine Plan sets out policies and themes but does not contain a spatial element to determine where development is most sustainable located, as well as how much development Welsh seas can sustainably carry. We are calling for a Marine Development Plan to provide robust development control and spatial policies, assessing cumulative impacts across all sectors. Development plans form the

basis of our terrestrial planning systems and ensure decisions are made in a front-loaded, spatial and holistic manner.

This will require more evidence to be gathered, for example into cumulative impacts, displacement of important and at-risk species, damage to blue carbon habitats and spatial opportunities for restoration and environmental enhancement.

8. What evidence do you have on the equality impacts of the transition? Where is there existing disparity which could be addressed via transition? What are the risks which need to be managed?

Scotland's Just Transition Commission has outlined that, in order to address equality aspects, we need to ensure:

- Planning for a managed transition
- Equipping people with the knowledge and skills they need, while putting in place safety nets to ensure no-one is left behind
- Involving those who will be impacted through co-design and collaboration
- Spreading the benefits of the transition widely, while making sure the costs do not burden those least able to pay.

In positive impacts, a just transition in agriculture would see the enhancement of farm businesses, by diversifying businesses to include sustainable land management as well as food production. As such, due to the geographic location of many farms, we should see the just transition of agriculture as an opportunity to create quality, rural jobs in areas which have strong connections to the Welsh language. More sustainable, rural jobs will enable Welsh speaking people to stay in traditionally Welsh speaking communities, bolstering the resilience of the language in rural areas.

In terms of risks, smaller sized farms may have less resources and therefore could find it disproportionately difficult to transition their operations to net zero practices. Economic disadvantage is already impacting equality and equity of access to healthy and sustainable food – this could be exacerbated by a transition to net zero, if not managed correctly. The true cost of food is not currently factored into food prices, but these hidden costs impact and increase spending in other sectors of society such as waste, pollution and health, as well as degrading our environmental resilience. A

just transition should take into account the duality of these issues and address them all at the same time, rather than treating them in silo. If these issues are tackled at source holistically – by converting agriculture to regenerative practices, promoting and supporting the production and consumption of healthier diets and addressing power imbalances within the food system – the risk to vulnerable groups will be reduced.

9. What evidence do you have on who is likely to be most affected by the transition?

At sea, there will likely be competition between seabed users (i.e. fishers) which do not have Crown Estate permission (as it is not needed to fish) and those who get licences to construct or operate on seabed. Whilst we do need renewable energy at sea, the impacts of wholesale transition, without a supporting framework to ensure developments are nature positive, will also displace other activities, such as traditional fishing practices (both directly and due to sub-sea cable routes). Fish stocks can be enhanced by designating areas as 'no fish zones', which would enhance immediate and adjacent fisheries.

With renewable expansion, the inshore area will become increasingly congested due to cable routes, port expansions, the need to rapidly restore and maintain key carbon sequestration and storage habitats (such as kelp, seagrass, saltmarsh). Some activities will either be displaced or need to be ceased (e.g. aggregate dredging) to enable a just transition to a low carbon and nature-rich Wales. This spatial squeeze at the coast will also inevitably impact on coastal communities, who should be engaged in the process from the start.

Regarding agriculture, farmers will undeniably be impacted by the shift to a nature friendly farming system due to the requirement to change the way many have been farming in recent decades. Although this is a challenge, this is also an opportunity to pursue a new model which prioritises farmers as stewards of the land for people and nature. By providing sufficient support to farmers to implement agroecological practices at farm and landscape scale, farmers across Wales will deliver a cost-effective form of farming which regenerates ecosystems and provides greater

resilience to shocks in the system, such as extreme weather, which affects nature, people and food producing businesses.

10. Who are the key actors, governance, regulatory/policy, and technological drivers and inhibitors for transition of each sector?

In the marine area, actions will need to align with delivering 'Good Environmental Status', as set under the UK Marine Strategy and UK Fisheries Act's objectives. For fishing, it's advisable to switch the UK's small-scale fishing fleet to low carbon electric and hybrid systems, as the recent report 'Electrifying the Fleet' sets out. The Joint Fisheries Statement and Fisheries Management Plans are also needed to be used to ensure stock levels are sustainable and fishing efforts matching accordingly. Licenses for fishing should also be aligned to support low impact and sustainable fishing practices.

As already set out, a Marine Development Plan is necessary for the planning system to be fully able to manage exploitation at sea and to identify nature-positive areas for development. This would reduce the regulatory burden, as the potential impacts will be assessed before going ahead, and will help developers with assurance as to where they can deploy, rather than being challenged later on.

For the agricultural sector, the key framework for governance is the Agriculture (Wales) Bill, the Sustainable Farming Scheme and a strong regulatory baseline in terms of National Minimum Standards. A well-resourced Natural Resources Wales (NRW) will be instrumental in enforcing high sustainability standards for farming. The Scheme will incentivise the right actions and behaviours as part of transition, but advice is also crucial so that farmers can move away from poor practices that have until now been seen as an essential part of farming, such as over-use of pesticides and artificial fertilizers. The current cost of many of these inputs is already helping farmers to see the benefit of changing their farming model.

A key inhibitor of the delivery of the Just Transition is the gap in regulation and enforcement of environmental law in Wales. We would like to echo again that one of the best things we can do for a just transition is to ensure there is a well-resourced Environmental Assessor and Governance Body. Without a well-resourced office,

Wales will remain an outlier in the UK and the EU, and will fall behind in the implementation of environmental law and the corresponding protections for climate and nature. It is also essential that NRW has the resources and the right culture to enforce standards in industrial sectors across Wales.

11. Do you have any other evidence that will help identify the impacts opportunities across our emission pathways or are there evidence gaps?

For our marine areas, there is very helpful evidence and recommendations on adaptation in the Future Fisheries Alliance report Shifting Gears: Achieving Climate-Smart Fisheries. Other evidence is linked throughout the response.

Support for Just Transition

13. What evidence and information is there across Wales to identify and develop required net zero skills?

We want to emphasise that 'net zero' skills aren't just those that adjust to low carbon industry with energy and efficiency. Nature is just as important and can carbon capture even better than many technologies can; protecting our woodland, species-rich grassland, salt marsh, seaweed and peatland is an excellent way of creating an economy centred on climate change protection. Many habitats that capture carbon, restore wildlife and enhance public enjoyment and access to nature also work as flood protection and management. The new National Forest and proposed new National Park in North-East Wales would also help to make nature more central to our regions and create more economic and employment opportunities. Our rivers, for example, are great for fishing and tourism, as well as access such as canals, but they are polluted and often taken for granted, whilst fish like salmon and sea trout are close to extinction. We want to make the case for a National Nature Service being part of the transition to Net Zero, and a climate conscious and nature positive economy, that can also take part in contributing to nature recovery and future nature targets.

As part of Natural Resources Wales' Green Recovery Taskforce, during the pandemic, our members were involved in a project for a National Nature Service in Wales. It was initially coordinated by the Food, Farming and Countryside Commission, and

now involves many more partners, to develop it into a workable pilot. We understand the Welsh Government has released a small amount of funding for a Business Case that should be taken forward over 2023-24. We have previously endorsed the idea in our paper, 'Jobs for a Green and Just Recovery', and includes an Annex from Ramblers Cymru setting out what some of these jobs might look like on the ground.

A green and just recovery for Wales will be crucial in realising the ambitions a just transition, and a Nature Service can act as a hub for training young people into the land management and restoration sectors, as well as retraining people from previous industries – particularly employees more used to outdoor skilled work, monitoring or engineering – to access nature jobs. It would create structural changes needed to allow people and nature to recover together and be resilient to future challenges. Retaining and creating jobs is a key fiscal stimulus, so if jobs are removed, new jobs should be created.

Green jobs have been defined differently over the last 20 years, as jobs that: protect or enhance the environment, or make environmental improvements; rely on natural resources; or rely on a high quality environment (e.g. tourism). When governments talk about green/blue economic growth, they often focus on renewables, forestry or construction as the main sectors with potential for growth. It is important to understand that jobs in these sectors are only sustainable and green by definition if they do not trade off one environmentally positive impact (e.g. climate change mitigation) for a negative impact on ecosystems and biodiversity, through poor siting or design. For example, Wales has positioned itself as a potential testbed for a wide range of marine renewable energy projects. Several of these have great potential to support the fight against climate change, but struggle to demonstrate that they are unlikely to have a devastating effect on local biodiversity and ecosystem resilience.

Under this definition, jobs related to these projects must not be considered as 'green or blue' by governments until they are able to satisfy regulators that they will not create unacceptably negative trade-offs for nature. Similarly, agricultural and forestry jobs have the potential to be green jobs, as long as they are carried out using sustainable practices that work with nature, not against it. We want to see sustainable and nature friendly farming become the norm, and for forestry

operations to include a wide mosaic of habitats and adhere to the highest environmental standards.

To support farmers to transition to and maintain sustainable land management, we recommend the creation of regional training centres to drive collaboration and knowledge exchange, drawing upon the wealth of knowledge of farmers, businesses, conservationists and further and higher education institutions. Training centres could support young people, as well as adults and older people to develop the skills they need to implement nature friendly farming at a farm and landscape level. Such skills would enable the creation of quality jobs for people in the rural economy, enabling people to stay in rural communities, supporting the economy and culture.

14. What evidence is there to demonstrate the additional support and information needed to identify and develop required net zero skills?

There is a lack of opportunity in net zero sectors and a lack of funding to reinforce and support these sectors, as well as a problem in phasing out polluting industries. Energy, shipping, transport and ports are key sectors for any successful economy, and we need to look beyond job losses and economic dips to transition confidently and deliberately.

As we move forward at an alarming pace in the developments of climate disasters and nature extinctions, we need to ensure that future generations are skilled for a world to one that has less carbon and more healthy ecosystems. The Future Generations report – Skills through Crisis: Upskilling and (Re)Training for a Green Recovery in Wales – demonstrates this well:

> "A key priority for the Welsh Government's employability and skills programmes is to ensure that they are preparing workers for the industries of the future. […] Areas such as construction, heating, electrical installation, engineering, and land and nature restoration all have significant future growth potential. The longevity of jobs will be an important consideration in any recovery package, and while demand for some jobs in green transition industries may experience a medium-term peak, many jobs will be sustained over a period of decades. While data is limited in detail and accuracy, this

> analysis would suggest there is significant potential to increase the rate of uptake of apprenticeships and other forms of skill development in these sectors. [The Welsh Government also should] provide certainty to Welsh individuals and businesses for them to invest in skills and facilities for the green economy of the future secure in the knowledge that good quality jobs and business demand will be ready and waiting. The potential regrets associated with upscaling investment and underwriting transition risks are significantly reduced by the many 'co-benefits' delivered by green transition investment. Among many benefits these can include ecological and social resilience and sustainability, reduced fuel poverty, wealth retention, fiscal stimulus and reduced inequalities".

There is already a skills gap and the National Nature Service would fill it in a bespoke way, fitting to the Welsh economy's needs, and able to evolve and respond as the data filters through as to which jobs and skills are most lacking in our day to day economy. Jobs Growth Wales was a great success story for Welsh Government in reducing youth unemployment and we anticipate this also being a good way to target particular groups with particular programmes (whilst still retaining the overall aim for this to be a universal programme for all, but accepting that targeted placements will help increase the diversity and prioritise those most in need of new skill pathways).

15. Are there any particular gaps in supporting a just transition?

As we try to emphasise in this response, nature is often left behind in discussing the necessary transition, and too much focus on just reducing carbon, and not how we can best sequester, protect and restore carbon in natural habitats.

It would help all sectors for Wales to have a clear plan for transition, with milestones and timelines setting out 'how and when'. Industries need clarity, as soon as they can, as to how they will be affected, or compensated or staff retrained, so they can factor this into their own forward planning. Particularly on funding, and how existing and future funding will be used to support the transition.

In order to effectively deliver the just transition, the governance of the transition should utilise the WFG Act and the rights-based approach as a model for industries

and sectors aiming for Net Zero. However, this must be underpinned by the commitment to restore nature by 2030. Moving towards sustainable land management is one step, but we must go further and deliver change to the agroecological system at a landscape level to ensure that nature can recover in Wales.

16. What evidence do you have to show effective involvement of people, communities and organisations to enable their participation in developing and implementing a just transition? Including, enabling participation that fully represents the perspectives of diverse communities in Wales and specifically those with protected characteristics?

In terms of the Welsh language in rural communities, we want to highlight that Welsh is the everyday language of 43% of those employed in agriculture and is central to farming communities' identities. As a result, any change in scheme structures and provisions should ensure that the Welsh language provision is not weakened. Otherwise, the transition risks undermining the Welsh Government's own objective of increasing the number of Welsh speakers. The transition to the Sustainable Farming Scheme, in particular, will be critical to ensure that the skills and capacity required by the new scheme are available within the community and that the Welsh language continues to be a defining aspect of rural Wales.

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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