Cyswllt Amgylchedd Cymru | Wales Environment Link

CCEI Committee Inquiry response: Halting and reversing the loss of nature by 2030

Friday 23rd August

Note: The whole paper meets the overall word count of 2500 words, but we do go over 500 for question 2.

1. Your views on the effectiveness of current policies / funds / statutory duties in halting and reversing the loss of nature by 2030.

While Welsh Government often has positive nature policies on paper, we need more substantive delivery with much more urgency and effectiveness. For example the National Natural Resources Policy (NRP) has had little material impact since it was published in 2018, and was not updated (despite a legislative requirement to do so) after the last Senedd election. When challenged on this, Ministers have stated that it might not be addressed until 2026 (para 37). Similarly, whilst the Environment (Wales) Act 2016 set out processes via Area Statements to help local nature recovery, it has been little more than a mapping and stakeholder exercise, and it's yet to be seen how or if they will change and improve processes.

The still undelivered Environmental Principles and Biodiversity Bill has the potential to improve this framework retroactively, but we fear that some White Paper proposals – such as an essential and strong Overarching Objective to 'halt the loss of nature by 2030 and restore by 2050' – may be weakened. Meanwhile, we continue to lack oversight through an environmental governance body and the Interim Assessor - whilst doing their best to fill the gap – has no formal investigatory powers, and lacks resource to do anything beyond collating concerns about the functioning of existing environmental law.

Halting biodiversity loss needs to become a responsibility and priority throughout the public sector, as is the case for addressing climate change. Applying this approach

should lead to changed spending priorities – moving public money out of damaging activities and into nature positive approaches, including in the management of the public estate.

A review of the Natural Resources Policy and the "nature recovery framework" proposed in the White Paper consultation (para 23) is an opportunity to apply this cross departmental approach and provide a funding framework that includes requirements on departmental spending priorities and provides mechanisms for high integrity private finance. Direct spend on biodiversity restoration is a small but essential part of this wider framework.

2. Your views on the progress towards implementing the Biodiversity Deep Dive recommendations.

Many of the commitments made under the Biodiversity Deep Dive are for actions that are included in WEL's Pathways to 2030 report[1], and in our oral evidence to the Climate Change, Environment and Infrastructure Committee in June 2023, we called for the development of a costed Nature Recovery Action Plan for Wales, owned across Cabinet. This would give a clearer picture of the investment needed to deliver Welsh Government's ambitions for nature restoration and recovery; enable investment in nature; and provide opportunities for integration between portfolios and sectors.

The first recommendation of the Deep Dive – "To transform the protected sites series so that it is better, bigger, and more effectively connected" – with actions predominantly focused on expanding and scaling up the Nature Networks programme, is welcome. This is the only significant funding intervention for improving the condition, connectivity and resilience of protected sites. This has been endorsed by the latest State of Nature 2023 report, outlining the continued decline of our wildlife, with 18% (1 in 6) of our species at risk from extinction.

It also stresses the need to complete the Marine Protected Area network. We have been waiting over a decade for new Marine Conservation Zones (MCZs), to address

[1] This was originally published in March 2023; in September 2024, we will publish an updated version with costs updated for inflation and to integrate estimates for net zero targets for land management.

the shortfalls identified in the Welsh MPA network, to complete an ecologically coherent network. In an increasingly crowded sea, MCZs could offer refuge to rare species and help to protect essential blue carbon stores. We urge the designation process to progress at pace, and to be accompanied by robust management. A further recommendation to establish a seagrass restoration scheme does seem to have some progress. It was agreed at a Ministerial roundtable held in February that the Seagrass Network Cymru (consisting of government, management agencies, NGOs, practitioners and business) develop a National Seagrass Action Plan (NSAP), which was submitted to the Cabinet Secretary in July. We urge Government to endorse and publish the NSAP and provide necessary resource to initiate its implementation to restore Welsh Seagrass.

Much wildlife survives outside of protected sites, and we do not want these sites to be islands of biodiversity in otherwise barren landscapes and seas. Consequently, it is critical that nature recovery includes the expansion and revitalization of urban green space and a Sustainable Farming Scheme that halts nature loss on farmland. In the marine environment, we welcome Welsh Government's upcoming review of marine planning, and urge that recommendations are prioritised in order to ensure a sustainable balance between industry and nature in our seas, both inside and outside Marine Protected Areas.

Nature Networks Fund

This Fund – established by Welsh Government, administered through the National Lottery Heritage Fund (NLHF) – is an excellent opportunity to focus on reversing declines in biodiversity. However, in Round 3, Welsh Government made a 27% cut, reducing the budget to £8.9m. This means no grants in the larger bracket were awarded for delivery in this past year (2024/25).

The introduction of project development funding was a welcome part of Round, but the expectation that these should be less than two years curtails ambition, with many meaningful projects lasting longer. In addition, capping participation to one application per organisation stunts ambition. In 2022, WEL members were informed that the NLHF received 36 Expressions of Interest – totalling more than £30m – for the larger two-stage process alone. This was triple the total available budget under

both the large and medium Nature Networks opportunities, and shows the level of demand, need and opportunity.

Other funds that benefit nature

Despite the nature and climate emergency being declared, funding opportunities at scale in Wales are considerably lower than 5 years ago. There is no replacement to post-Brexit EU LIFE funding in sight and other mechanisms such as Rural Development Plans are unavailable. In addition, there is a worrying gap in certainty of support for land management before the new Sustainable Farming Scheme is in place, including the level of contribution this support will make to meeting climate and nature commitments. The concern is compounded by fears that Scheme popularity may be prioritised before effectiveness, which if this were to happen would represent an absolute failure to invest public money in nature friendly farming to meet key environmental challenges. A recent independent report concludes Wales needs to spend £600m annually to support environmental land management. This scale of need highlights the requirement for the rural budget to be used as effectively as possible to secure environmental enhancements, that benefit us all. Finally, there is currently no clear route or timetable to support and guide appropriate conservation investment from private sources into Wales. However, in the marine area, MARINE Fund Cymru – being taken forward through the Wales Coast and Seas Partnership – could be a good example to learn from.

Whilst medium grants (up to £250k) like The Woodland Investment Grant (TWIG) are welcome, they are not fully addressing declining biodiversity; nature needs us to act across landscapes, together and at scale. By design, they fall short of delivering against the necessary connectivity depicted by the Welsh Government's DECCA principles and NRW's Resilient Ecological Networks approach of bigger sites, better condition, and better connected and more resilient.

The large funding facility (£250,000 – £1m) within the Nature Networks Fund is the only grant route for funding truly collaborative partnership delivery for multiple years (focused on meeting '30 by 30' targets). Anything under £250k makes it very difficult to work at the scale we need to involve multiple partners and make a strategic difference.

3. Your views on current arrangements for monitoring biodiversity.

Natural Resources Wales is under resourced on monitoring effectively, as has been acknowledged multiple times previously at the CCEI Committee, and we only know the status of about 50% of Welsh SSSIs (Sites of Special Scientific Interest).

Much species-specific monitoring is dependent on volunteer citizen science, in collaboration with NGOs like our members. However, despite perceptions, citizen science is not free and requires high level coordination, and the input of voluntary time and resources to ensure useable data is collected. Whilst we're keen to help in both monitoring and delivering on the nature targets, NGO funding is often not very robust. A 2021 report by the Funding Centre, commissioned by WEL, shows that the environmental NGO sector is mainly supported by public donations and attracts the least government funding across England and Wales. Many NGOs struggle to survive but do provide good value for money in matching and topping up that public investment. If the monitoring of targets continues to depend on citizen science programmes, organised by NGOs, the Welsh Government needs to be aware of the costs of such programmes, the vulnerability of the eNGO sector and be potentially willing to pay for this monitoring.

We also need collaboration on monitoring between land managers, farmers, local government and Natural Resources Wales, with more support for Local Nature Partnerships that can enable closer working relationships. Area Statements could be utilised for this, so they are an active vehicle for local collaboration around nature.

For the marine context, NRW's State of Natural Resources Report 2020 states: "In general, we have an incomplete understanding of some pressures due to the challenges in monitoring the marine environment and subsequently establishing a causal link between pressures and observed impacts. We need to better understand the temporal and spatial distribution and impact of activities and related pressures." We look forward to NRW publishing full, updated, condition assessments for all SACs and SPAs in Wales, in November (the work will cover roughly 50% of the Welsh inshore area). Along with their work on mapping strategic opportunities to enhance marine resilience, we hope that this will give us a much clearer idea of actions which should be taken, where, and by whom, to improve the resilience of marine

ecosystems. Beyond MPAs, the JNCC's Marine Biodiversity Monitoring Programme spans UK territorial and offshore waters, focusing on biodiversity in the wider environment and within Marine Protected Areas. However, it has never been adequately funded, and it is unclear if it ever will be or how the four nations would come together to do so.

4. Your views on new approaches needed to halt and reverse the loss of nature by 2030.

Our 'Pathways to 2030 report' outlines the ten areas we recommend focusing on to meet (or at least get closer to) our 2030 targets. It estimates costs for enabling restoration on the themes of: public engagement and access; farmland; coasts; seas; peatland; grassland; protected sites; rivers and wetlands; woodland; and species. We set out actions that are divided between: stopping activities damaging to nature; reducing adverse effects on nature; and starting positive actions for nature's recovery. It's essential to remember that halting further damage is equally as important as starting to make positive interventions. Budgetary decisions aren't just about where money is spent, but where money is saved, and we can save both money and nature by not funding businesses, sectors or jobs that are overall damaging to nature or the climate, as well as reinvest into sustainable jobs that restore biodiversity and counter climate change. We must address the drivers of decline as robustly as we try to manage the consequences; it's the only logical approach.

We invite the Committee to consider our Pathways report as a fuller answer to this question but for example, on peatlands, we urge for activities that destroy peatland – like burning or planting trees in the wrong place – to be stopped immediately. Whilst restoration itself often costs money, a lot of action can be taken by being bold enough to stop damage we're historically dismissed. On grasslands, it's a simple but effective plan to improve the management of our 30,000 miles of roadside verges and public green space. This is more of a procedural change than a funding change. But it does take people to coordinate and drive forward action, especially when it's working in a new way, so we propose a team of champions and advisors to provide guidance to local authorities, businesses and gardens (gardens being often overlooked as a privately owned area), with a communications budget, at a total cost

of £400k. A common theme in new programmes is a lack of ongoing funding for people to keep training, pushing and updating processes in a way that puts nature first; capital money alone won't do it, revenue funding is valuable in resourcing the people that will enact that change, and often more cost-effectively than a short term boost of capital, that can be much harder to spend in a short window.

5. Do you have any other points you wish to raise within the scope of this inquiry?

Government priorities

Traditionally, in not just Wales but globally, business needs are prioritised above nature's, and this traditional approach must change if we're to halt nature loss. We are short sighted to think that nature will wait, or that we don't depend on it for our livelihoods. For example, whilst there are protests about changing of subsidies for farming, there is little attention or awareness that without restoring nature, our food will not be pollinated, our water will not be clean and our soils will be too degraded to even grow food. Change is difficult, but it will be far more difficult to tackle once we can no longer sustain ourselves, because we have taken nature for granted.

Funding criteria for community involvement

Further to our comments on current nature-based funds in the second question; most of the available funds require community-level involvement detailed at application stage; whilst we applaud the principle and absolutely try to do this wherever and whenever we can (as people's connection to nature is important, can help create ongoing voluntary support), it's come to our attention from some WEL members that it can be a barrier. Some areas in urgent need of nature restoration are particularly remote or difficult to get to, and do not have any nearby communities able to contribute to its work. It'd be helpful if some consideration of this can be taken by funders, particularly if the work proposed would change a currently inaccessible area to one where local communities can access.

Skills

We have not had space to include discussion here on green skills and job creation; we would refer MSs to the Nature Service Wales project and our previous briefings on green/blue jobs.

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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