

Agenda – Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith

Lleoliad:	I gael rhagor o wybodaeth cysylltwch a:
Fideogynhadledd drwy Zoom	Marc Wyn Jones
Dyddiad: Dydd Iau, 9 Rhagfyr 2021	Clerc y Pwyllgor
Amser: 09.15	0300 200 6565
	SeneddHinsawdd@senedd.cymru

Rhag-gyfarfod anffurfiol (09.00–09.15)

Yn unol â Rheol Sefydlog 34.19, mae'r Cadeirydd wedi penderfynu gwahardd y cyhoedd o gyfarfod y Pwyllgor at ddibenion diogelu iechyd y cyhoedd. Bydd y cyfarfod hwn yn cael ei ddarlledu'n fyw ar www.senedd.tv.

Cyfarfod cyhoeddus

1 Cyflwyniad, ymddiheuriadau, dirprwyon a datgan buddiannau (09.15)

2 Rheoli'r amgylchedd morol – sesiwn dystiolaeth 1: Cyfoeth Naturiol Cymru

(09.15–10.15)

(Tudalennau 1 – 36)

Rhian Jardine, Pennaeth Cynllunio Datblygu a Gwasanaethau Morol – Cyfoeth
Naturiol Cymru

Mary Lewis, Rheolwr Mannau Cynaliadwy Tir a Mor – Cyfoeth Naturiol Cymru

Dr Jasmine Sharp, Cynghorydd Arbenigol Arweiniol, Rheoleiddio Morol –
Cyfoeth Naturiol Cymru

Dogfennau atodol:

Papur briffio: Morol

Papur – Y Gweinidog Newid Hinsawdd (ymateb i lythyr gan y Cadeirydd 2



Tachwedd 2021)

Papur – Cyfoeth Naturiol Cymru

Egwyl (10.15–10.25)

3 Rheoli'r amgylchedd morol – sesiwn dystiolaeth 2: datblygwyr ynni morol

(10.25–11.25)

(Tudalennau 37 – 46)

Jess Hooper, Rheolwr Rhaglen – Ynni Morol Cymru

David Jones, Rheolwr Ymgysylltu â Rhanddeiliaid – Blue Gem Wind

Dogfennau atodol:

Papur – Ynni Morol Cymru (Saesneg yn unig)

Papur – Blue Gem Wind (Saesneg yn unig)

Egwyl (11.25–11.40)

4 Rheoli'r amgylchedd morol – sesiwn dystiolaeth 3: cynllunio morol ac Ardaloedd Morol Gwarchoddedig

(11.40–12:40)

(Tudalennau 47 – 66)

Claire Stephenson, Uwch-gynllunydd Cadwraeth – RSPB Cymru

Clare Trotman, Pennaeth Cadwraeth Cymru (Dros Dro) – Cymdeithas

Cadwraeth Forol

Emily Williams, Cyd-gadeirydd, Gweithgor Morol – Cyswllt Amgylchedd Cymru

Dogfennau atodol:

Papur – RSPB Cymru (Saesneg yn unig)

Papur – Y Gymdeithas Cadwraeth Forol (Saesneg yn unig)

Papur – Cyswllt Amgylchedd Cymru (Saesneg yn unig)

Egwyl cinio (12.40–13.20)

Rhag-gyfarfod anffurfiol (13.20–13.30)

5 Rheoli'r amgylchedd morol – sesiwn dystiolaeth 4: carbon glas ac Ardaloedd Morol Gwarchodedig

(13.30–14.30)

(Tudalennau 67 – 81)

Sue Burton, Swyddog Ardal Cadwraeth Arbennig Forol Sir Benfro

Sean Clement, Arbenigwr Adfer Moroedd – WWF Cymru

Clare Trotman, Pennaeth Cadwraeth Cymru (Dros Dro) – Cymdeithas

Cadwraeth Forol

Dr Richard Unsworth, Athro Cyswllt mewn Bioleg Forol, Prifysgol Abertawe, a

Chyfarwyddwr Project Seagrass

Dogfennau atodol:

Papur – Sue Burton (Saesneg yn unig)

Papur – WWF Cymru (Saesneg yn unig)

Papur – Dr Richard Unsworth (Saesneg yn unig)

6 Papurau i'w nodi

(14.30)

6.1 Addasu i newid hinsawdd

(Tudalennau 82 – 83)

Dogfennau atodol:

Llythyr gan y Cadeirydd at y Gweinidog Newid Hinsawdd mewn perthynas â

chynllun addasu hinsawdd i Gymru

6.2 Gollyngiadau carthion

(Tudalennau 84 – 85)

Dogfennau atodol:

Llythyr gan y Cadeirydd at y Cadeirydd, Cyfoeth Naturiol Cymru, mewn perthynas â gollyngiadau carthion heb eu caniatáu

6.3 Fframweithiau Cyffredin

(Tudalennau 86 – 87)

Dogfennau atodol:

Llythyr gan y Cwnsler Cyffredinol a Gweinidog y Cyfansoddiad at y Cadeirydd, y Pwyllgor Deddfwriaeth, Cyfiawnder a'r Cyfansoddiad, ynghylch

Fframweithiau Cyffredin

6.4 Bil yr Amgylchedd

(Tudalennau 88 – 89)

Dogfennau atodol:

Llythyr gan y Gweinidog Newid Hinsawdd, a'r Cwnsler Cyffredinol a Gweinidog y Cyfansoddiad, at y Cadeirydd, y Pwyllgor Deddfwriaeth, Cyfiawnder a'r Cyfansoddiad ynghylch y ddadl ar y Cynnig Cydsyniad Deddfwriaethol sy'n ymwneud â darpariaethau ym Mil Amgylchedd y DU

6.5 Cymru'r Dyfodol: y cynllun cenedlaethol 2040 – polisiau ynni adnewyddadwy

(Tudalennau 90 – 96)

Dogfennau atodol:

Gohebiaeth at y Cadeirydd gan Non Davies ar ran Preswylwyr Moelfre mewn perthynas â pholisiau ynni adnewyddadwy yn nogfen Cymru'r Dyfodol: y cynllun cenedlaethol 2040 gan Lywodraeth Cymru (Saesneg yn unig)

Gohebiaeth at y Cadeirydd gan Clive Goodridge a Kate Watson mewn perthynas â pholisiau ynni adnewyddadwy yn nogfen Cymru'r Dyfodol: y cynllun cenedlaethol 2040 gan Lywodraeth Cymru (Saesneg yn unig)

Gohebiaeth at y Cadeirydd gan Dr Dean mewn perthynas â pholisiau ynni adnewyddadwy yn nogfen Cymru'r Dyfodol: y cynllun cenedlaethol 2040 gan Lywodraeth Cymru (Saesneg yn unig)

6.6 Canolfan Ganser Felindre

(Tudalen 97)

Dogfennau atodol:

Gohebiaeth gan unigolyn ynghylch lleoliad arfaethedig Canolfan Ganser Felindre (Saesneg yn unig)

- 7 Cynnig o dan Reol Sefydlog 17.42 (vi) a (ix) i benderfynu gwahardd y cyhoedd o weddill y cyfarfod (14.30)

Cyfarfod preifat (14.30–15.30)

- 8 Rheoli'r amgylchedd morol – trafod y dystiolaeth a glywyd o dan eitemau 2,3,4 a 5
- 9 Trafod adroddiad drafft y Pwyllgor ar flaenoriaethau ar gyfer y Chweched Senedd
- 10 Trafod Blaenraglen Waith y Pwyllgor

Mae cyfyngiadau ar y ddogfen hon

Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref

Llyr Gruffydd AS
Cadeirydd
Y Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith Gwledig
Senedd Cymru
Caerdydd
CF99 1SN

1 Rhagfyr 2021

Annwyl

Diolch yn fawr am eich llythyr dyddiedig 2 Tachwedd yn gofyn am y newyddion diweddaraf ynghylch yr argymhellion a amlinellwyd yn adroddiad y Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith Gwledig 'Cynnydd Llywodraeth Cymru o ran Rheoli Ardaloedd Morol Gwarchoddedig'.

Amgaeaf gyda'r llythyr hwn ddiweddariad ar yr holl argymhellion a gyflwynwyd. Amgaeaf yn ogystal ddiweddariad ynghylch ein rhaglen Carbon Glas yng Nghymru a datblygiadau ym maes cynllunio gofodol morol.

Yn gywir

Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

Tudalen y pecyn 20
We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Argymhelliad 1

Dylai Llywodraeth Cymru gyflwyno strategaeth uchelgeisiol ar gyfer Ardaloedd Morol Gwarchoddedig ar frys. Dylai wneud hynny erbyn yr haf 2020. Dylai'r strategaeth ganolbwyntio ar yr angen i ddefnyddio dulliau lleol a dulliau ar lefel rhwydwaith i gyflawni amcanion cadwraeth Ardaloedd Morol Gwarchoddedig unigol lle y bo'n briodol. Dylai'r fframwaith a'r cynllun gweithredu fod yn rhan ategol o'r strategaeth. I gyd-fynd â'r strategaeth, dylid darparu esboniad o sut y mae Llywodraeth Cymru yn bwriadu ariannu'r gwaith o Reoli Ardaloedd Morol Gwarchoddedig yn barhaus. Dylai'r strategaeth fod yn destun ymgynghoriad llawn a dylid ei hadnewyddu o bryd i'w gilydd

Ymateb

Gwrthodwyd yr argymhelliad hwn gan Weinidog yr Amgylchedd a Materion Gwledig.

Argymhelliad 2

Dylai Llywodraeth Cymru drafod gyda'r Grŵp Llywio ar Reoli Ardaloedd Morol Gwarchoddedig sut i gael mewnbwn gan sylfaen ehangach o randdeiliaid a mwy o awdurdodau rheoli Ardaloedd Morol Gwarchoddedig. Gallai hyn gynnwys ehangu'r grŵp i gynnwys aelodau ychwanegol neu greu is-grwpiau perthnasol. Dylai Llywodraeth Cymru adrodd yn ôl i'r Pwyllgor hwn ar ganlyniad y trafodaethau hyn.

Ymateb

Yn ei swydd fel Gweinidog â phortffolio gwahanol, sefydlodd Gweinidog yr Amgylchedd a Materion Gwledig Grŵp Llywio ar Reoli Ardaloedd Morol Gwarchoddedig (MPAs) yn 2014 i roi cyngor ac arweiniad ar sut i reoli'n rhwydwaith o MPAs. Rwyf o'r farn bod cynrychiolaeth briodol o ystod eang o randdeiliaid yn aelodau o'r grŵp hwn, a bod ganddynt brofiad eang o reoli'n rhwydwaith o MPAs. Mae'r grŵp llywio'n parhau i ysgwyddo'i swyddogaeth sylfaenol gan oruchwylio prosiectau gwerthfawr a buddiol o fewn y Cynllun Gweithredu Rheoli Rhwydwaith yr Ardaloedd Morol Gwarchoddedig.

Gwnaeth fy swyddogion sefydlu is-grŵp Cydnerthedd Morol o WMAAG er mwyn ehangu'r cylch o bobl sy'n cael trafod ac ystyried polisi bioamrywiaeth môr. Mae cylch ehangach o bobl sy'n cynrychioli amrywiaeth o fuddiannau yn cael bod yn aelod o'r is-grŵp Cydnerthedd. Mae'n atebol i WMAAG a'r Grŵp Llywio ar Reoli'r Rhwydwaith MPAs.

Argymhelliad 3

Dylai Llywodraeth Cymru ystyried a ddylid cyflwyno dyletswyddau i Weinidogion Cymru, yn debyg i'r dyletswyddau ar Awdurdodau Pysgodfeydd a Chadwraeth y Glannau yn Lloegr o dan Ddeddf y Môr a Mynediad i'r Arfordir 2009, a dylent adrodd yn ôl i'r Pwyllgor ar y mater hwn

Ymateb

Yn ei swydd fel Gweinidog â phortffolio gwahanol, cyhoeddodd Gweinidog yr Amgylchedd a Materion Gwledig adroddiad ar Brexit a'n Moroedd a chyhoeddi datganiad ysgrifenedig: [Ymateb i ymgynghoriad Brexit a'n Moroedd a'r camau nesaf tuag at bolisi pysgodfeydd ar gyfer Cymru yn y dyfodol \(15 Medi 2020\) | LLYW.CYMRU](#). Mae Llywodraeth Cymru yn dal i fod yn ymrwymedig i fynd i'r afael mewn ffordd strategol gref â physgodfeydd a dyframaethu ac i ddatblygu polisi pysgodfeydd mewn cydweithrediad â'i rhanddeiliaid.

Argymhelliad 4

Dylai Llywodraeth Cymru ddatblygu cynigion, mewn ymgynghoriad â'r Grŵp Llywio ar Reoli Ardaloedd Morol Gwarchoddedig, ar gyfer dull gweithredu ar sail ardal a fyddai'n gweld awdurdodau rheoli yn rhoi swm o arian yn y pot sy'n gymesur â maint yr ardal warchoddedig y mae ganddynt gyfrifoldeb amdani. Dylai'r cyllid hwn fod yn ychwanegol at y cyllid ar gyfer y camau yn y Cynllun Gweithredu, yn hytrach nag yn lle'r cyllid hwnnw.

Ymateb

Gwrthodwyd yr argymhelliad hwn gan Weinidog yr Amgylchedd a Materion Gwledig.

Argymhelliad 5

Dylai Llywodraeth Cymru ystyried, mewn trafodaeth â phum Grŵp Awdurdod Perthnasol Cymru, sut y bydd Is-adran y Môr a Physgodfeydd yn datblygu dull mwy integredig o weithio gyda'r grwpiau hyn

Ymateb

Ers sefydlu'r Grŵp Llywio ar Reoli Ardaloedd Morol Gwarchoddedig, mae nifer o Grwpiau Awdurdodau Perthnasol Ardaloedd Cadwraeth Arbennig ynghyd â Swyddog Safleoedd Morol Ewropeaidd (EMSO) wedi dod yn aelodau ohono, i gynghori'r grŵp.

Mae fy swyddogion wedi ystyried opsiynau ar gyfer ymgysylltu â nhw ymhellach a chynnwys Grwpiau Awdurdodau Perthnasol yn WMAAG a gallaf gadarnhau bod ganddynt gynrychiolaeth dda bellach ar WMAAG ac is-grŵp Cydnerthedd WMAAG.

Argymhelliad 6

Dylai Llywodraeth Cymru nodi'r nifer benodol o staff yng nghanen cadwraeth forol Is-adran y Môr a Physgodfeydd ac adrodd yn ôl i'r Pwyllgor hwn.

Ymateb

Ysgrifennodd yr Ysgrifennydd Parhaol at y Pwyllgor Newid Hinsawdd, yr Amgylchedd a Materion Gwledig ym mis Rhagfyr 2019 i ymateb i'r argymhelliad hwn. Rwyf am ofyn i'm swyddogion ddangos y llythyr i'r Pwyllgor.

Argymhelliad 7

Rhaid i Lywodraeth Cymru sicrhau bod ei strategaeth dwristiaeth sydd ar ddod yn rhoi sylw i fioamrywiaeth a chadwraeth forol

Ymateb

Gwnaeth y Dirprwy Weinidog Diwylliant a Chwaraeon gyhoeddi Blaenoriaeth Economi Ymwelwyr 2020-25 Llywodraeth Cymru yn 2020. Un o brif amcanion y strategaeth yw datblygu twristiaeth yng Nghymru er mwyn sicrhau ei buddiannau economaidd, ond gan wneud hynny mewn ffordd amgylcheddol gynaliadwy, gan gynnwys yn yr amgylchedd morol.

Mae'r Strategaeth yn hyrwyddo 'Cynaliadwyedd Amgylcheddol' yn enwedig y defnydd cynaliadwy o'n hadnoddau naturiol. Bydd fy swyddogion yn gweithio gyda chyrrff sy'n ymdrin â gwarchod a rheoli'n tirweddau hardd, gan gynnwys amgylchedd y môr, i sicrhau bod yr amcan hwn yn cael ei gyflawni.

Mae fy swyddogion yn cydweithio â'r Is-adran Twristiaeth a Croeso Cymru sydd hefyd yn aelodau o WMAAG. Mae'r aelodau'n cydweithio'n glos i ddatblygu Cynllun Datblygu Adferiad Glas gyda'i nod o gryfhau amgylchedd ein moroedd.

Argymhelliad 8

Dylai Llywodraeth Cymru ysgrifennu at gynrychiolwyr y sector twristiaeth bywyd gwyllt morol i'w gwahodd i Grŵp Cynghori a Gweithredu Cymru ar Faterion Morol (WMAAG) a dylai roi diweddariad ar hynt sefydlu is-grŵp Bioamrywiaeth o Grŵp Cynghori a Gweithredu Cymru ar Faterion Morol.

Ymateb

Gwnaeth fy swyddogion drafod yr argymhelliad hwn gydag aelodau WMAAG i awgrymu cynrychiolydd addas ar gyfer y sector. Cytunwyd nad oes yr un sefydliad yn cynrychioli'r sector twristiaeth bywyd gwyllt y môr a daethpwyd i'r casgliad y byddai'r grŵp yn gynrychiolydd addas, gan ei fod yn cynnwys mudiadau fel RSPB ac Ymddiriedolaethau Natur Cymru sy'n ymwneud â thwristiaeth bywyd gwyllt.

Cyfarfu'r Gweinidog Newid Hinsawdd ag aelodau WMAAG yn ddiweddar a chefnogi ei gynigion ar gyfer yr Adferiad Glas. Mae'r Gweinidog wedi gofyn i aelodau weithio gyda swyddogion yn ystod tymor y Senedd hwn i ddatblygu Cynllun Gweithredu ar gyfer ei gyflawni.

Y bwriad yw y bydd y cynllun yn esbonio sut i caiff ymrwymadau'r Rhaglen Lywodraethu, a gwaith cyfredol ac arfaethedig Llywodraeth Cymru, eu rhoi ar waith. Bydd yn cynnwys hefyd sut i hybu dealltwriaeth o'r cefnogaeth, ymgyhoeddwr a buddsoddi cynaliadwy hirdymor

mewn ecosystemau morol gwydn, gan roi ffordd gydlynol o fynd i'r afael â'r newid yn yr hinsawdd ac argyfyngau natur.

Bydd y grŵp yn ymgysylltu'n ehangach â rhanddeiliaid fel rhan o'i fandad diweddaraf i ddatblygu Cynllun Gweithredu Adferiad Glas.

Argymhelliad 9

Dylai Llywodraeth Cymru esbonio pam nad yw mesurau rheoli wedi eu gweithredu eto o ganlyniad i Brosiect Asesu Gweithgareddau Pysgota Cymru ar gyfer gweithgareddau risg uchel, a gyhoeddwyd yn 2017. Dylai gyflwyno ymgynghoriad ar opsiynau rheoli ar y gweithgareddau hyn ar frys. Dylai Llywodraeth Cymru gytuno ar amserlen gyda Cyfoeth Naturiol Cymru ar gyfer cwblhau'r asesiadau sy'n weddill, ond ni ddylai hynny fod yn hwyrach na mis Ionawr 2021 fan bellaf. Dylai Llywodraeth Cymru asesu lefel yr adnoddau fydd eu hangen ar Cyfoeth Naturiol Cymru i gwblhau'r gwaith hwn

Ymateb

Mae Llywodraeth Cymru yn parhau i weithio gyda CNC i ddatblygu prosiect Asesu Gweithgareddau Pysgota Cymru. Yn 2016, rhoddwyd blaenoriaeth i gynnal 516 o asesiadau o offer pysgota. Mae 70 wedi dod i law CNC a disgwylir y bydd 39 o asesiadau o offer llusg ar waelod y môr yn cyrraedd ym mis Mawrth 2022.

Mae prosiect Asesu Gweithgareddau Pysgota Cymru yn parhau i fod yn flaenoriaeth a byddaf yn lansio ymgynghoriad cyhoeddus unwaith y bydd yr holl asesiadau o offer llusg a chynigion ar gyfer mesurau rheoli wedi'u cwblhau.

Argymhelliad 10

Dylai Llywodraeth Cymru ystyried pa mor ddymunol fyddai gwneud y gwaith o gynhyrchu adroddiadau cyflwr nodweddion ar lefel safle a chasglu gwybodaeth fonitro berthnasol yn ofyniad statudol

Ymateb

Mae data ac adroddiadau monitro ar lefel safle yn hanfodol er mwyn deall cyflwr Ardaloedd Morol Gwarchoddedig yng Nghymru. Maent yn llywio'r sylfaen dystiolaeth sy'n cefnogi rheolaeth effeithiol ac ymdrechion i gyflawni a chynnal cyflwr ffatriol nodweddion.

Mae nifer o ofynion yn dylanwadu ar asesiadau cyflwr ar lefel safle yng Nghymru, gan gynnwys: rheoliad 9A o Reoliadau Gwarchod Cynefinoedd a Rhywogaethau 2017; rheoliad 6A o Reoliadau Gwarchod Cynefinoedd a Rhywogaethau ar y Môr; adran 124 yn adrodd ar rwydwaith yr Ardaloedd Morol Gwarchoddedig gan Weinidogion Cymru i'r Senedd o dan Ddeddf y Môr a Mynediad i'r Arfordir 2009; Adroddiad ar Gyflwr Adnoddau Naturiol o dan Ddeddf Amgylchedd (Cymru) 2016; rheoliadau 10 a 13 o Reoliadau Strategaeth Forol 2010; ac adroddiadau ar lefel nodwedd gan Lywodraeth y DU i Gomisiwn OSPAR. Er nad yw'r rhain yn nodi gofynion statudol penodol, dylid cydnabod eu bod yn sbarduno asesiadau cyflwr ar lefel safle gan fod hynny'n ffordd allweddol o sicrhau'r adroddiadau sydd eu hangen.

Mae CNC wedi adolygu sut i gynnal asesiadau o gyflwr safleoedd MPA drwy brosiect Gwella Adroddiadau Asesu Cyflwr ar lefel Safle Morol a ariennir gan EMFF. Caiff canfyddiadau'r prosiect hwn a'r broses a ddatblygir ddod yn rhan o rwymedigaethau adrodd CNC mewn cylch 6 blynedd.

Argymhelliad 11

Dylai Llywodraeth Cymru sicrhau bod bylchau tystiolaeth Ardaloedd Morol Gwarchoddedig yn cael sylw drwy roi'r Cynlluniau Tystiolaeth Morol a'r Cynlluniau Tystiolaeth Pysgodfeydd ar waith

Ymateb

Mae Llywodraeth Cymru'n dal i weithio'n glos ag CNC, JNCC a rhanddeiliaid eraill i ddatblygu ein sylfaen dystiolaeth forol ac i fonitro'r gwaith sy'n cael ei wneud i gasglu'r dystiolaeth y dangosodd Strategaeth Tystiolaeth Forol Cymru bod ei hangen. Mae hynny'n

cynnwys y wyddoniaeth a'r dystiolaeth sydd eu hangen i ni allu cyflawni'n rhwymedigaethau o ran y rhwydwaith Ardaloedd Gwarchoddedig.

Argymhelliad 12

Dylai Llywodraeth Cymru adrodd yn ôl ar hynt gwaith y Grŵp Gorchwyl a Gorffen a sefydlwyd i ddynodi Parthau Cadwraeth Morol posibl. Dylai Llywodraeth Cymru ofyn i'r Grŵp Gorchwyl a Gorffen gyflwyno cynigion ar gyfer ymgynghoriad cyn gynted â phosibl, ond heb fod yn hwyrach na mis Chwefror 2020 fan bellaf.

Ymateb

Mae'r Grŵp Gorchwyl a Gorffen Parthau Cadwraeth Morol a thîm y prosiect wedi parhau i gyfarfod a chydweithio ar nodi Parthau Cadwraeth Morol posibl yn nyfroedd Cymru ac mae cyfres o gyfarfodydd rhithwir wedi'u cynnal.

Mae prosiect Cwblhau Rhwydwaith yr MPA yn parhau i fod yn flaenoriaeth, ond dylwn nodi bod holl adrannau Llywodraeth Cymru o dan straen ar hyn o bryd yn bennaf oherwydd pwysau ymadael â'r Undeb Ewropeaidd a'n hymateb i bandemig Covid-19. Mae hyn wedi rhoi pwysau sylweddol ar ein hadnoddau ac ar allu swyddogion i gynnal rhaglenni gwaith eraill. Bydd swyddogion yn lansio rhag-ymgynghoriad ar ddechrau 2022 i gasglu tystiolaeth cyn ymgynghori'n ffurfiol.

Rwy'n parhau'n ymwybodol o'r angen i sicrhau bod rhanddeiliaid a'r cyhoedd yn cael eu cynnwys a'u bod yn cael cyfle i ddweud eu dweud er mwyn sicrhau eu cefnogaeth. Bydd amserlenni'r prosiect yn adlewyrchu'r gofyn cyfreithiol o dan Adran 119(10) o Ddeddf y Môr a Mynediad i'r Arfordir, 2009, ynghylch ymgynghori cyn dynodi.

Argymhelliad 13

Dylai Llywodraeth Cymru ofyn i'r Grŵp Gorchwyl a Gorffen ystyried, fel rhan o'i waith, yr angen am ddynodiadau Parthau Cadwraeth Morol gwarchoddedig iawn. Dylid ymgynghori'n helaeth â phartïon â buddiant, fel pysgotwyr, er mwyn llywio'r ystyriaeth hono.

Ymateb

Gwrthodwyd yr argymhelliad hwn gan Weinidog yr Amgylchedd a Materion Gwledig.

Argymhelliad 14

Dylai Llywodraeth Cymru ofyn i'r Grŵp Gorchwyl a Gorffen ddatblygu cynllun ar gyfer dynodi Parthau Cadwraeth Morol ar gyfer rhywogaethau symudol.

Ymateb

Rwyf wedi ymrwmo i ystyried yr angen i ddynodi Parthau Cadwraeth Morol yng Nghymru fel rhan o brosiect Cwblhau Rhwydwaith yr Ardaloedd Morol Gwarchoddedig. Mae'r Grŵp Gorchwyl a Gorffen yn gwneud y gwaith fesul cam, gan ganolbwyntio yn y lle cyntaf ar ddynodi cynefinoedd. Er hynny, mae dynodi er lles rhywogaethau symudol yn dal i fod yn rhan o'r drafodaeth.

Argymhelliad 15

Dylai Llywodraeth Cymru gynnal neu gomisiynu asesiad o'r effaith ar reoli Ardaloedd Morol Gwarchoddedig yn sgil ymadael â'r UE, gan gynnwys y posibilrwydd o gollu mynediad at ymchwil, sefydliadau a chyllid yr UE. Wrth wneud hynny, dylai egluro sut y bydd yn lliniaru unrhyw effaith o'r fath.

Ymateb

O'r £375m o gyllid rhanbarthol blyneddol y mae Llywodraeth Cymru wedi bod yn ei gael gan yr UE, defnyddiwyd £60m i ariannu datblygu adnoddau ymchwil ac arloesi. Nid yw'r Gronfa Ffyniant a Rennir newydd y mae Llywodraeth y DU wedi addo a fydd yn llwyr gwneud iawn am yr holl arian a gollir, wedi cyrraedd eto. Nid yw'n glir sut y caiff y gronfa hon ei dyrannu i weinyddiaethau datganoledig ond yr wyf yn pryderu y bydd yn llai na'r £375m a oedd yn dod i ni.

Mae Llywodraeth Cymru, trwy roi ein Rhaglen Lywodraethu ar waith, yn ymrwmo i gyflwyno cynlluniau adfer trwy fuddsoddiad yn seiliedig ar anghenion pobl Cymru. Byddwn

yn cyhoeddi Cyllideb Llywodraeth Cymru ar 20 Rhagfyr a byddwn yn ceisio sicrhau'r setliad tecaf posibl i wasanaethau cyhoeddus Cymru i sicrhau Cymru fwy llewyrchus a gwyrdd.

Mae'r Môr a Physgodfeydd yn dal i ddatblygu cynigion ar gyfer ariannu cynllun i olynu'r EMFF ar gyfer 2022/23.

Bydd buddsoddi drwy gynllun sy'n olynu'r EMFF yn cyfrannu at Gynllun Morol Cenedlaethol Cymru, Deddf Llesiant Cenedlaethau'r Dyfodol (Cymru) yn ogystal â'r egwyddorion a'r ymrwymadau penodol yn y Rhaglen Lywodraethu ynghyd ag ymrwymadau a wnaed yn y Cynlluniau JFS a Rheoli Pysgodfeydd.

Y diweddaraf ynghylch cynllunio gofodol morol

Mabwysiadwyd Cynllun Morol Cenedlaethol Cymru gan Weinidogion Cymru ym mis Tachwedd 2019. Gyda Datganiad Polisi Morol y DU, mae'n gosod fframwaith strategol ar gyfer datblygu moroedd Cymru yn gynaliadwy. Ar ôl ei gyhoeddi, cyhoeddwyd Canllawiau Gweithredu, i lywio'r defnydd ymarferol o bolisïau'r Cynllun a helpu i sicrhau ei fod yn cael ei weithredu'n effeithiol ac yn gyson. Mae swyddogion wedi gweithio gydag llawer o awdurdodau cyhoeddus i roi'r Cynllun ar waith.

Cyhoeddwyd Fframwaith Monitro ac Adrodd ar gyfer y Cynllun Morol ym mis Ionawr 2020. Bydd yn sail i'r adroddiad adolygu a monitro ffurfiol cyntaf ar y Cynllun, a fydd yn cael ei gyhoeddi yn 2022. Mae swyddogion wedi cynnal Arolwg o Ddefnyddwyr fydd yn bwydo'r adroddiad a'r bwriad yw cynnal ail Arolwg o Ddefnyddwyr yng ngwanwyn 2022.

Ers cyhoeddi'r Cynllun Morol, mae swyddogion wedi gweithio gyda rhanddeiliaid i ddatblygu ffordd o roi ei bolisïau ar waith ar sail gofodol, gan roi cyfeiriad a chyd-destun gofodol ar gyfer datblygiadau.

Drwy'r prosiect Rheoli Adnoddau Naturiol Morol (SMMNR) sydd newydd ei gwblhau, cynhaliodd swyddogion arolwg a map ecolegol o wely'r môr i helpu i gynllunio ar gyfer y sectorau ynni ffrwd llanw, ynni tonnau a dyframaeth. Mae pecyn mapio a thystiolaeth amgylcheddol ar ffurf 'Byrddau Stori' rhyngweithiol ar-lein wedi'u cyhoeddi i rannu'r fethodoleg fapio ac allbynnau'r prosiect, er mwyn i ddefnyddwyr allu canolbwyntio ar ardaloedd neu ystyriaethau amgylcheddol penodol.

Defnyddiwyd allbynnau prosiect SMMNR, ynghyd â gwaith i ddeall yn well natur rhyngweithiau gofodol traws-sector posibl ym moroedd Cymru, i ddatblygu Canllawiau Lleoli Sectorol (SLG) ar gyfer y sectorau ynni ffrwd llanw, ynni tonnau a dyframaeth. Nod yr SLG, drwy roi darlun o wasgariad adnoddau naturiol ac ystyriaethau cysylltiedig mewn perthynas â defnydd cynaliadwy, yw helpu i lywio gweithgarwch i'r ardaloedd all cynnal datblygiadau newydd orau heb beryglu ecosystemau morol.

Fel rhan o ddull gofodol o roi'r cynllun ar waith, mae Gweinidogion Cymru wedi dechrau gweithio'n ddiweddar i fapio Ardaloedd Adnoddau Strategol (AAS) posibl i nodi a chymhwyso polisi'r Cynllun Morol ar gyfer diogelu ardaloedd lle ceir adnoddau allweddol. Cafodd y dull o nodi AASau posibl a'r egwyddorion dylunio ar gyfer datblygu AASau eu datblygu ar y cyd â'r Grŵp Cyfeirio Rhanddeiliaid Cynllunio Morol (MPSRG).

Mae Llywodraeth Cymru wedi bod yn rhoi mewnbwn cynllunio morol hefyd er budd amrywiaeth o fentrau ledled y DU i ddefnyddio adnoddau gwynt sefydlog ac arnofiol ar y môr yn gynaliadwy.

Gan edrych i'r dyfodol, byddwn yn cyhoeddi SLG ar gyfer y sectorau ffrwd llanw, ynni tonnau a dyframaeth ac yn gweithio gyda rhanddeiliaid i fwrw ymlaen â datblygu AASau posibl, gan ymgynghori ar gynigion. Byddwn hefyd yn adrodd yn 2022 ar effaith polisiâu'r Cynllun Morol a'r gwaith sy'n cael ei wneud i gyflawni amcanion y Cynllun ac, fel rhan o'r broses adrodd hon, byddwn yn ystyried yr angen i ddiwygio'r Cynllun Morol neu ei ail-gynllunio yng nghyd-destun tirwedd forol y DU sy'n newid yn gyflym.

Y diweddaraf am rôl gynyddol Carbon Glas yng Nghymru

Rwy'n cydnabod y rôl gynyddol bwysig y gall carbon glas ei chwarae wrth fynd i'r afael â'r argyfyngau natur a hinsawdd, ac mae Cymru Sero Net yn cynnwys cynnig newydd i'n helpu i ddeall yn well sut y gallwn gyfrif y cyfraniad y mae'n ei wneud drwy'r Rhestr Nwyon Tŷ

Gwydr, a deall effeithiau posibl gweithgarwch dynol a newid yn yr hinsawdd ei hun ar gynefinoedd ac allyriadau carbon glas.

Mae fy swyddogion yn gweithio'n agos gydag CNC, y gweinyddiaethau eraill a'r gymuned wyddonol i ddeall y problemau a'r cyfleoedd yn well, a byddwn yn cydweithio gyda'r bwriad o sefydlu Partneriaeth Tystiolaeth Carbon Glas y DU ddechrau'r flwyddyn nesaf, i fynd i'r afael â'r cwestiynau hyn. Yng Nghymru, byddwn yn datblygu ac yn cyflwyno cynllun tystiolaeth carbon glas i lywio partneriaeth y DU ar y naill law ac i bennu anghenion penodol Cymru am dystiolaeth ar y llall. Mae trafodaethau wedi dechrau ynghylch ffurfio gweithgor i ddatblygu'r cynllun tystiolaeth hwn.

Yn y cyfamser, drwy rwydwaith Ardaloedd Morol Gwarchoddedig Cymru a thrwy ddefnyddio Cynllun Morol Cenedlaethol Cymru fel sail ar gyfer ein penderfyniadau, byddwn yn parhau i reoli llawer o'r cynefinoedd hynny sy'n cynnal ac yn gwella carbon glas.



Nodyn Briffio i'r Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith

Rheoli'r Amgylchedd Morol

Tachwedd 2021

Mae'r nodyn hwn yn ymdrin â'r cynnydd hyd yma yn nifer o feysydd gwaith allweddol CNC, ac mae hefyd yn tynnu sylw at rai rhwystrau a chyfleoedd i ddatblygu'r gwaith o reoli'r amgylchedd morol yn gynaliadwy ymhellach.

1. Rôl CNC mewn rheoli'r amgylchedd morol

Diben cyffredinol CNC yw ceisio rheoli adnoddau naturiol yn gynaliadwy. Mae'r rôl hon yn ymestyn i'r amgylchedd morol, sy'n ffurfio bron i hanner tiriogaeth Cymru. Mae rôl CNC mewn perthynas â rheoli'r amgylchedd morol yn eang, gan gynnwys, er enghraifft: cyngor, tystiolaeth, rheoleiddio (gan gynnwys trwyddedu morol), monitro, rheoli perygl llifogydd / erydu arfordirol, ymateb i ddigwyddiadau, rheoli safleoedd gwarchoddedig, rheoli pysgodfeydd cocos (Cilfach Tywyn ac afon Dyfrdwy), a'r awdurdod mordwyo ar gyfer afon Dyfrdwy.

2. Y cynnydd hyd yma, a rhwystrau a chyfleoedd yn y dyfodol

Cydsynio a thrwyddedu morol

Mae CNC yn gyfrifol am drwyddedu morol ar ran Gweinidogion Cymru ar gyfer gweithgareddau trwyddedadwy ledled Parth Cymru. Er enghraifft, rhwng mis Mehefin 2020 a mis Tachwedd 2021, yn y sector adnewyddadwy morol, cyhoeddodd CNC 12 trwydded forol; mae pum trwydded yn ymwneud â gwaith adeiladu, newid neu wella sy'n gysylltiedig

â'r sector ynni adnewyddadwy, a chyhoeddwyd saith trwydded mewn perthynas â gwaith arolygu ar safleoedd prosiect. Llywodraeth Cymru yw'r awdurdod gorfodi ar gyfer trwyddedu morol yng Nghymru.

Mae Tîm Trwyddedu Morol CNC hefyd yn darparu cyngor arbenigol cyn gwneud cais. Mae gan gyngor cyn gwneud cais fuddion amlwg i'r ymgeisydd, gan helpu i nodi materion ymlaen llaw a deall gofynion y broses drwydded forol, ac mae ganddo'r potensial i leihau'r cyfnod pennu ffurfiol. Er mwyn cefnogi cwsmeriaid, rydym hefyd wedi cynyddu faint o gynnwys gwe sydd ar gael ar y broses trwyddedu morol, a chanllawiau ar y dystiolaeth a'r gwaith asesu sy'n ofynnol i gyd-fynd â cheisiadau.

Er mwyn cefnogi prosiectau adnewyddadwy morol a lleihau'r baich gweinyddol, rydym wedi bod yn datblygu nifer o gytundebau ffyrdd o weithio rhwng CNC ac awdurdodau rheoleiddio eraill. Rydym yn parhau i rannu arfer gorau ag awdurdodau trwyddedu morol eraill. Mae hyn wedi bod o fudd arbennig i'r sector adnewyddadwy morol, lle roedd rhannu profiadau o brosiectau yn yr Alban yn helpu i lywio ein dull o reoli addasol.

Rhwystrau a chyfleoedd: Mae gorgyffwrdd sylweddol rhwng dyletswyddau a chyfrifoldebau rheoleiddio a all beri heriau i ddatblygwyr, ac sy'n gofyn am gydgysylltiad da gan y cyrff rheoleiddio. Mae angen cymeradwyaeth a thrwyddedau niferus ar gyfer prosiectau seilwaith mawr, yn enwedig ar gyfer prosiectau ynni. Byddai'n fuddiol i sicrhau aliniad â chyfundrefnau rheoleiddio, er mwyn symleiddio agweddau arnynt, gan osgoi dyblygu ymdrech a darparu llwybrau cliriach ar gyfer mewnbwn gan randdeiliaid.

Mae pobl yn aml yn credu y dylai ceisiadau trwyddedu morol ar gyfer datblygiadau mewn meysydd o flaenoriaeth polisi allu cael eu blaenoriaethu. Fodd bynnag, rhaid i CNC asesu pob cais yn gadarn trwy ddilyn y broses benderfynu statudol, a'r broses asesu a chynghori ategol, sydd, gyda'i gilydd, yn darparu mesurau diogelu pwysig ar gyfer yr amgylchedd ac iechyd a diogelwch dynol, yn ogystal â diogelwch gweithdrefnol a chyfreithiol. Mae cyflymder y broses bennu yn dibynnu'n bennaf ar ansawdd y wybodaeth a ddarperir gan y datblygwr. Bydd mwy o ymgysylltiad mewn cyngor cyn gwneud cais, a bydd ymgysylltu â rhanddeiliaid eraill, yn cefnogi cyflwyno ceisiadau trwydded cadarn ac yn helpu i leihau'r amserlen ar gyfer pennu cais.

Rhwystyr allweddol rhag cael cydsyniadau ar gyfer ynni adnewyddadwy morol yw'r ansicrwydd ynghylch effeithiau amgylcheddol allweddol, sy'n deillio o brinder data amgylcheddol sylfaenol, a diffyg tystiolaeth uniongyrchol o effeithiau dyfeisiau ynni penodol. Ymdrinnir â chyfleoedd perthnasol pellach isod o dan y Rhaglen Ynni Adnewyddadwy ar y Môr a chynllunio morol.

Ynni adnewyddadwy morol a'r Rhaglen Ynni Adnewyddadwy ar y Môr

Mae'r cyfuniad o swyddogaethau rheoleiddio a chynghori yn gosod CNC ar y blaen o ran cefnogi datblygiad ynni adnewyddadwy morol sy'n gynaliadwy yng Nghymru, sydd â photensial mawr i gefnogi targedau lleihau carbon ymhellach. Yn 2019, fe wnaethom sefydlu Rhaglen Ynni Adnewyddadwy ar y Môr CNC fel ymateb uniongyrchol i raddfa gynyddol datblygiadau ynni adnewyddadwy morol, a diddordeb gwleidyddol, cyhoeddus a pholisi uwch yng Nghymru, gan gynnwys cyfarfodydd gyda Phrif Weinidog Cymru yn 2019 i archwilio datblygu ein rôl.

Nod cyffredinol y Rhaglen Ynni Adnewyddadwy ar y Môr yw lleihau'r risgiau amgylcheddol a chydsynio sy'n gysylltiedig â datblygiadau ynni adnewyddadwy morol. Yn benodol, mae'r Rhaglen Ynni Adnewyddadwy ar y Môr wedi magu gallu ac arbenigedd CNC i gyflawni'r canlynol:

- Rheoli achosion a chyngor cyn ymgeisio yn well
- Datblygu swyddi allweddol a chanllawiau
- Adnodd staff ymroddedig ychwanegol sy'n canolbwyntio'n llwyr ar ynni adnewyddadwy morol – datblygu a chynnal parhad yr arbenigedd angenrheidiol
- Tystiolaeth feirniadol i leihau ansicrwydd cydsynio a mynd i'r afael â'r gwrthdaro canfyddedig rhwng yr argyfwng hinsawdd a'r argyfwng bioamrywiaeth
- Mwy o ymgysylltiad allanol â rhanddeiliaid allweddol

Ar hyn o bryd, rydym yn cynghori ar 15 o gynlluniau a phrosiectau ynni adnewyddadwy morol mawr a/neu newydd a chymhleth. Yn ogystal â hyn, mae'r Rhaglen Ynni Adnewyddadwy ar y Môr yn galluogi datblygu prosiectau canllaw a thystiolaeth allweddol – er enghraifft, datblygu canllawiau ar ddefnyddio rheoli addasol fel offeryn a all ganiatáu i ddatblygiadau gael cydsyniad pan nad yw'r effeithiau amgylcheddol wedi'u deall yn dda.

Mae CNC hefyd yn ymgysylltu â mentrau strategol ledled Cymru a'r DU i wella'r modd y darperir ynni adnewyddadwy morol, megis: Rhaglen Tystiolaeth a Newid Ynni Gwynt ar y Môr Ystad y Goron, a Rhaglen Ynni Morol a Her Morlyn Llanw Llywodraeth Cymru.

Rhwystrau a chyfleoedd: Ariennir y Rhaglen Ynni Adnewyddadwy ar y Môr dros dro tan fis Mawrth 2022, pan ddaw'r buddion i ben. Bydd nifer y cynlluniau a'r prosiectau y bydd CNC yn cynghori arnynt ac yn eu rheoleiddio yn parhau i gynyddu'n sylweddol, yn enwedig gyda'r gobaith o ffermydd gwynt alltraeth sefydlog ac arnofiol newydd a'r Her Morlyn Llanw. Mae angen buddsoddi yn CNC i sicrhau dull y Rhaglen Ynni Adnewyddadwy ar y Môr o gyflawni ynni adnewyddadwy morol yn y tymor hwy i ateb y galw hwn am ynni adnewyddadwy morol, ac ar yr un pryd i gefnogi blaenoriaethau eraill y llywodraeth ar gyfer yr amgylchedd. Er mwyn dangos yr anghenion o ran capasiti, mae ymgysylltiad cyfredol CNC ym mhrosiect fferm wynt alltraeth Awel y Môr wedi bod yn mynd rhagddo ers 2019, a hyd yma mae'n cyfateb i 320 awr o amser cynghorydd.

Mae angen buddsoddiad parhaus a chynyddol hefyd i wella'r sylfaen dystiolaeth ar gyfer yr amgylchedd morol, er mwyn helpu i leihau'r risg amgylcheddol ac i hwyluso'r broses o wneud penderfyniadau yn effeithlon ac yn amserol ac, yn y pen draw, o roi prosiectau ar waith. Mae hwn yn gyfrifoldeb ar y cyd i'r llywodraeth, datblygwyr ac CNC.

CNC yw'r ymgynghorai statudol ar gyfer cyngor ar gydsyniadau datblygu a thrwyddedau morol yn nyfroedd Cymru o fewn 12 milltir forol. Mae gan y Cyd-bwyllgor Cadwraeth Natur y cyfrifoldeb hwn yn ardal forol alltraeth Cymru y tu hwnt i 12 milltir forol. Mae swyddogaethau tebyg wedi cael eu symleiddio'n llwyddiannus o amgylch yr Alban a Lloegr, gyda chyfrifoldebau cynghori wedi'u dirprwyo i NatureScot a Natural England. Mae hyn wedi lleihau cymhlethdod ac wedi cynyddu effeithlonrwydd i ddatblygwyr, rheoleiddwyr a chynghorwyr. Gellid mabwysiadu trefniant tebyg yn ddefnyddiol i fynd i'r afael â'r anghysondeb o amgylch dyfroedd Cymru.

Cynllunio morol

Mae Cynllun Morol Cenedlaethol Cymru yn darparu'r prif fframwaith ar gyfer datblygu morol cynaliadwy. Mae CNC wedi gwneud gwaith sylweddol i gefnogi'r gwaith o weithredu Cynllun Morol Cenedlaethol Cymru. Mae hyn yn cynnwys datblygu canllawiau gweithdrefnol trwyddedu morol, swyddi cynghori, hyfforddi staff, a llawlyfr gwaith achos morol i gefnogi cymhwyso egwyddorion ymgynghorol a pholisi'r cynllun yn ein cyngor.

Rhwystrau a chyfleoedd: Bydd cynllunio sectoraidd strategol a datblygu dull gofodol ar gyfer cynllunio morol yn darparu mwy o gymorth i nodi ardaloedd adnoddau allweddol, ochr yn ochr â sensitifrwydd a chyfyngiadau, i helpu i leihau risgiau cydsynio trwy lywio datblygiadau i leoliadau lle mae'r effeithiau ar yr amgylchedd a defnyddwyr eraill yn is. Mae CNC bellach yn cymryd rôl arweiniol wrth ddarparu'r dystiolaeth i gefnogi Llywodraeth

Cymru i ddatblygu cynllunio sy'n fwy rhagnodol yn ofodol, trwy nodi'r ystyriaethau amgylcheddol gofodol ar gyfer gwahanol sectorau.

Casglu tystiolaeth forol a'r bylchau mewn tystiolaeth

Ers ei greu, mae CNC wedi ymrwymo'n gryf i fod yn sefydliad sy'n seiliedig ar dystiolaeth. Rydym yn ceisio sicrhau bod ein strategaethau, penderfyniadau, gweithrediadau a chynghor i Lywodraeth Cymru ac eraill wedi'u tanategu gan dystiolaeth gadarn sydd o ansawdd uchel.

Mae [Strategaeth Tystiolaeth Forol Cymru](#) (2019), a ddatblygwyd ar y cyd gan Lywodraeth Cymru ac CNC, yn amlinellu blaenoriaethau'r dystiolaeth forol strategol lefel uchel sydd eu hangen i gefnogi polisïau a chynlluniau morol yng Nghymru. Mae'r strategaeth yn darparu fframwaith ar gyfer casglu tystiolaeth, gan gynnwys ymchwil a datblygu, monitro a gwyliadwriaeth, a dadansoddi a chyfuno eilaidd, gan wella cydweithredu ar yr un pryd.

Yn CNC, mae'r Rhaglen Tystiolaeth Forol ac Arfordirol yn cynhyrchu rhestr wedi'i blaenoriaethu o anghenion tystiolaeth yn flynyddol. Mae'r Rhaglen Monitro Morol hefyd yn cael ei blaenoriaethu, gyda chylch monitro rheolaidd, gan ganolbwyntio ar y Rheoliadau Fframwaith Dŵr (2019) ac Ardaloedd Morol Gwarchoddedig.

Dros yr ychydig flynyddoedd diwethaf, mae cyrff cadwraeth natur rhyngwladol, y Cydbwyllgor Cadwraeth Natur a phartneriaid eraill yn y DU wedi adolygu opsiynau monitro blaenoriaeth ar sail risg ar gyfer y mwyafrif o grwpiau cynefinoedd a rhywogaethau morol y DU. Datblygwyd achos busnes i gefnogi'r holl opsiynau monitro a ffeirir ac a gyflwynwyd i Adran yr Amgylchedd, Bwyd a Materion Gwledig (DEFRA).

Mae blaenoriaethau tystiolaeth forol CNC ar gyfer y flwyddyn nesaf yn cynnwys monitro, coladu gwybodaeth sylfaenol i lywio sawl maes gwaith (e.e. dosraniadau mamaliaid morol, mapio cynefinoedd), gwaith i lywio cynghor ynni adnewyddadwy ar y môr, ac astudiaethau carbon glas.

Rydym yn casglu ein tystiolaeth trwy amrywiaeth o lwybrau, gan gynnwys gwaith mewnol, gwaith wedi'i gontractio'n allanol, prosiectau gwyddoniaeth dinasyddion, a chydweithrediadau â sefydliadau eraill, gan gynnwys y byd academiaidd, y llywodraeth a diwydiant.

Rydym yn rhagweld y bydd o leiaf 15 o adroddiadau tystiolaeth forol ac arfordirol yn cael eu cynhyrchu yn 2021. Cyhoeddir mwyafrif ein hadroddiadau ar ein gwefan yma: [Cyfoeth Naturiol Cymru / Adroddiadau tystiolaeth morol ac arfordirol](#). Cynhyrchwyd set arall o adroddiadau yn 2020, ac maent bellach yn cael eu trosi i fformat hygyrch cyn cael eu lanlwytho i'n gwefan.

Rhwystrau a chyfleoedd: Mae'n sylfaenol bwysig ein bod yn deall cyflwr ein hamgylchedd morol ac arfordirol os ydym am wneud penderfyniadau cadarn ynghylch rheoli. Fodd bynnag, mae'r cyllid sydd ar gael ar gyfer monitro morol yn llawer is na'r hyn sy'n ofynnol. Er enghraifft, yr opsiwn a ffeirir i Gymru ar gyfer monitro benthig ar y lan yw ychydig dros £3 miliwn (gan gynnwys staff ac adnoddau presennol). Ac eithrio staff, byddai hynny'n rhoi cyfanswm o oddeutu £2 filiwn. Mae'r adnoddau ar gyfer monitro morol wedi lleihau dros y naw mlynedd diwethaf.

Mae llawer o'n hanghenion tystiolaeth yn broblemau cymhleth y mae'n rhaid mynd i'r afael â nhw gyda rhaglenni ymchwil aml-flwyddyn. Yn anffodus, mae'r cylch cyllido blynyddol yn ei gwneud hi'n anodd iawn i CNC alluogi hyn.

Yn y dyfodol, rydym yn gobeithio gweithio gyda Phlattform Amgylchedd Cymru i greu gwell cysylltiadau â'r byd academiaidd ac i ledaenu ein hanghenion ymchwil.

Ardaloedd Morol Gwarchodedig, cadernid ecosystemau, a'u hadfer

Mae gwella rheolaeth a chyflwr y rhwydwaith o Ardaloedd Gwarchodedig Morol yn flaenoriaeth i CNC er mwyn sicrhau cadernid ecosystemau morol. Mae ystod eang o waith cynghori, tystiolaeth, rheoleiddio a gweithredol CNC yn cyfrannu at hyn. Rydym yn cyflawni gweithredoedd yng Nghynllun Gweithredu Rheoli Rhwydwaith Ardaloedd Morol Gwarchodedig Cymru fel mater o drefn ar draws ein swyddogaethau. Roeddem hefyd yn gallu defnyddio cyllid cyfalaf a ddarparwyd gan Lywodraeth Cymru yn ystod 2020/21 i ymgymryd ag ystod o welliannau i safleoedd, gan gynnwys, er enghraifft, gwella cynefinoedd artiffisial mewn morgloddiau o amgylch Aberdaugleddau a gwaith dichonoldeb i archwilio adfer morfeydd heli yng Nglanfa Rhymni.

Mae CNC hefyd yn darparu cyngor a thystiolaeth i gefnogi prosiect Llywodraeth Cymru i gwblhau'r rhwydwaith o Ardaloedd Morol Gwarchodedig trwy ddynodi Parthau Cadwraeth Forol.

Rhwystrau a chyfleoedd: Mae deall cyflwr Ardaloedd Morol Gwarchodedig yn hanfodol i lywio gweithredu priodol. Ar ôl cyhoeddi cyfres lawn o asesiadau cyflwr safle dangosol ar gyfer Ardaloedd Morol Gwarchodedig yn 2018, rydym yn agosáu at gwblhau prosiect i ddatblygu dangosyddion adrodd newydd i'w cymhwyso fel rhan o adolygiad llawn arfaethedig o gyngor amcan cadwraeth CNC ar gyfer Ardaloedd Morol Gwarchodedig. Bydd hyn yn sicrhau ein bod yn rhoi'r cyngor ac asesiadau gorau i gefnogi gwneud penderfyniadau ar weithgareddau mewn Ardaloedd Morol Gwarchodedig ac yn agos atynt.

Mae adfer yn ganolbwynt allweddol bellach ar gyfer cadernid ecosystemau morol, gan gynnwys ymrwymiad diweddar yn y Rhaglen Lywodraethu ar gyfer rhaglen wedi'i thargedu i adfer cynefinoedd morfa heli a morwellt (a storfeydd carbon glas allweddol hefyd). Mae adfer gweithredol yn yr amgylchedd morol yn cyflwyno heriau ymarferol sylweddol ond, serch hynny, mae gwaith ar y gweill y gallwn ddysgu ohono a chymryd camau pellach yn ei sgil. Mae CNC eisoes yn arwain ar brosiect a ariennir gan Gronfa Môr a Physgodfeydd Ewrop sy'n mynd ati i adfer cynefin wystrys brodorol yn Aberdaugleddau, gan bwysleisio pwysigrwydd dysgu sut i dyfu prosiectau o'r fath. Mae prosiect partneriaeth Natur am Byth yn cynnwys elfen forol uchelgeisiol sy'n canolbwyntio ar adfer glaswellt y môr, wystrys, gwyntyll môr pinc a chimychiaid coch. Rydym hefyd wedi cyhoeddi mapiau cyfle sy'n nodi ardaloedd posibl ar gyfer adfer ystod o gynefinoedd morol ac arfordirol (gweler Atodiad 2).

Yn fwyaf diweddar, mae CNC wedi dechrau datblygu blaenraglen waith integredig wedi'i blaenoriaethu ar gyfer adfer gweithredol sy'n adlewyrchu'r goblygiadau ymarferol, tystiolaeth, cyngor a rheoliadol ehangach ar gyfer CNC sydd ynghlwm wrth y maes hwn sy'n datblygu.

Carbon glas

Mae CNC wedi cynnal ymchwil bwysig mewn perthynas â charbon glas i gefnogi gwella storfeydd carbon glas yng Nghymru, gan gynnwys y canlynol:

- Meintioli potensial carbon glas amgylchedd morol ac arfordirol Cymru (gweler Atodiad 1)
- Ymchwil gyfredol i nodi storio a dal carbon ymhellach ar lefel nodwedd ac Ardal Forol Warchoddedig ar draws y rhwydwaith; mae'r gwaith hwn hefyd yn nodi opsiynau rheoli i wella'r ddalfa garbon yng Nghymru

Rhwystrau a chyfleoedd: Nid oes fframwaith ar gyfer amddiffyn carbon glas fel y cyfryw ac felly mae angen ystyried gwella fel budd cymdeithasol ehangach sy'n deillio o reolaeth effeithiol a chynaliadwy o'r amgylchedd morol ac sy'n gwella cadernid ecosystemau, bioamrywiaeth, a maint a chyflwr cynefinoedd. Rydym wedi blaenoriaethu blaenraglen waith i ymgorffori'r ystyriaeth o garbon glas ym mhob agwedd ar ein cyngor, ac i ddatblygu ymhellach y dystiolaeth ar sut a ble y gallwn wella dal a storio carbon glas mewn ardaloedd morol ac arfordirol.

Rheoli'r arfordir

Mae'r rhyngwyneb arfordirol yn ardal lle mae effeithiau'r newid yn yr hinsawdd ar eu mwyaf difrifol yn sgil cynnydd yn lefel y môr. Mae CNC wedi sefydlu Rhaglen Rheoli Arfordirol Integredig i ddod â gwahanol ffyrddau gwaith ynghyd yn CNC, gan gynnwys rheoli perygl llifogydd, bioamrywiaeth, cynllunio, rheoleiddio a mynediad, i fynd i'r afael â her benodol y newid yn yr hinsawdd ar yr arfordir. Mae'r rhaglen yn cyflawni ystod eang o gamau, gan gynnwys, er enghraifft, dull cydgysylltiedig o asesu canllawiau a mynd i'r afael â gwasgfa arfordirol, gan ystyried datblygiad polisi diweddar Llywodraeth Cymru yn y maes hwn.

Rhwystrau a chyfleoedd: Mae'r ardal arfordirol yn destun fframwaith deddfwriaethol a rheoliadol cymhleth iawn. Er mwyn mynd i'r afael â her allweddol y newid yn yr hinsawdd a lefelau'r môr yn codi, bydd angen mynd i'r afael â nifer o rwystrau, ac mae angen deialog ac ymgysylltu sylweddol â chymunedau lleol i nodi atebion effeithiol i'r materion sy'n eu hwynebu. Mae Cynlluniau Rheoli Traethlin yn ddogfennau anstatudol, ond dylent fod yn offeryn hanfodol wrth alluogi rheolaeth gynaliadwy o'n harfordir. Mae atebion ar sail natur, fel adfer cynefinoedd arfordirol (e.e. morfeydd heli) neu ddefnyddio technegau fel maeth traeth, yn darparu cyfleoedd i sicrhau nifer o fuddion o ran amddiffyn yr arfordir, enillion mewn bioamrywiaeth, a charbon glas.

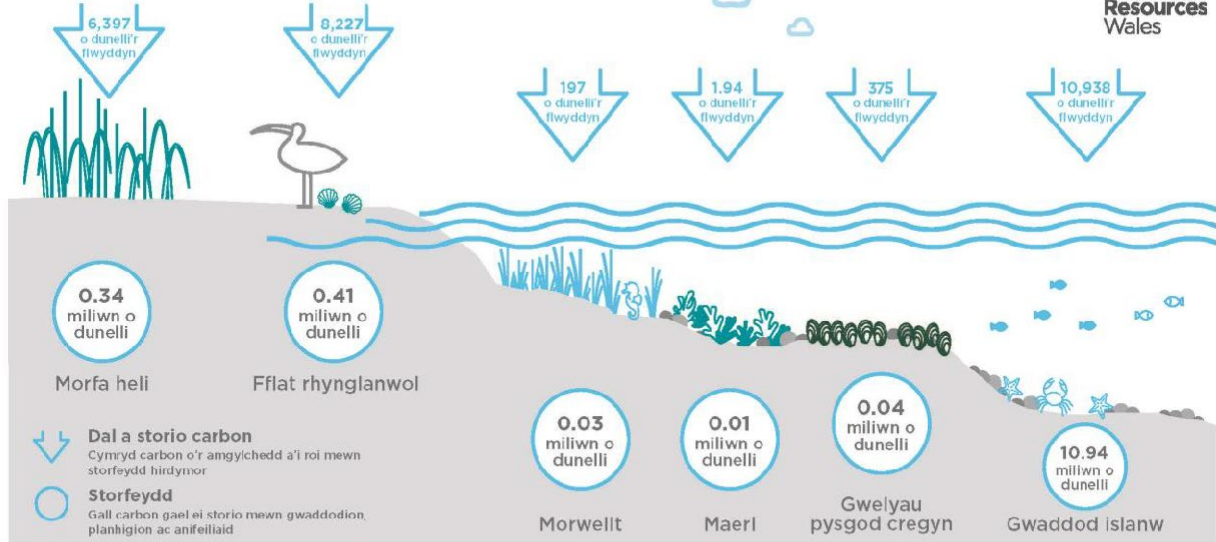
Ymgysylltu â rhanddeiliaid

Mae ymgysylltu ag ystod o rhanddeiliaid morol ac arfordirol yn elfen graidd o waith strategol a gweithredol CNC. Rydym yn cymryd rhan weithredol mewn ystod o bartneriaethau, gan gynnwys, er enghraifft, Grŵp Cyngori a Gweithredu Cymru ar Faterion Morol a'r Grŵp Cyngori Strategol Cydsynio ar y Môr. Cyhoeddwyd y Datganiad Ardal Forol gennym yn 2019, sef penllanw ein rhaglen ymgysylltu ag ystod o'n partneriaid i nodi'r blaenoriaethau a chyfleoedd allweddol ar gyfer rheoli'r ardal forol yn gynaliadwy. Rydym yn parhau i weithio ar y cyd i gyflawni'r camau a nodwyd yn y Datganiad Ardal.

Rhwystrau a chyfleoedd: Rhwystr cydnabyddedig i ymgysylltu â rhanddeiliaid a chydweithio yw diffyg gallu ymhlith partneriaid morol yng Nghymru, ynghyd â diffyg ymwybyddiaeth ymhlith cymunedau arfordirol o'r heriau a'r cyfleoedd a gyflwynir gan amgylcheddau morol ac arfordirol. Cydnabuwyd hyn yng ngwaith Grŵp Cynghori a Gweithredu Cymru ar Faterion Morol o amgylch adferiad glas. Mae cyfle i ddylanwadu ar ffrydiau cyllido yng Nghymru mewn ffordd a all adeiladu gallu ac ymwybyddiaeth, ac felly gefnogi ymgysylltiad a chyflawni prosiectau a gweithgareddau morol ac arfordirol yn fwy gweithredol.

Atodiad 1: Carbon ym moroedd Cymru

Carbon ym moroedd Cymru



Cyfanswm dal a storio
O leiaf 26,100 o dunelli o garbon y flwyddyn

- £6.6 miliwn
- 64,800 o allyriadau blynyddol
- 115,600 o deithiau dwyffordd Caerdydd - Ynsoedd Canaria

Cyfanswm y storffeydd
O leiaf 113 o filiynau o dunelli o garbon yn y tymor hir (gan gynnwys 101 o filiynau o dunelli wedi'u storio ar ffurf carbonad)

- 10 mlynedd o allyriadau carbon Cymru
- 170% o'r carbon sydd wedi'i storio yng nghoetiroedd Cymru

Bylchau yn y dystiolaeth

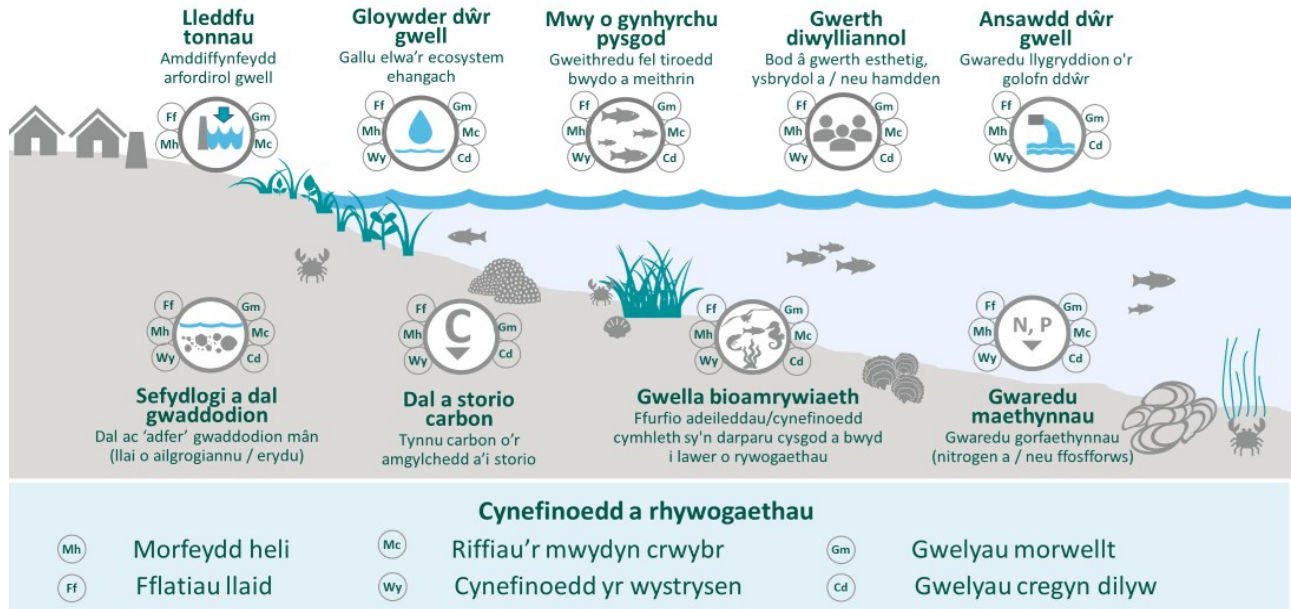
- Cyfraddau ac amrywiadau
- Sut mae gweithgareddau'n newid y broses dal a storio
- Sut mae cyflwr cynefinoedd yn newid storffeydd a'r broses dal a storio

Dal a storio mwy o garbon

- Diogelu
- Adfer
- Cyllid

Atodiad 2: Buddion cynefinoedd morol ac arfordirol wedi'u hadfer

Buddion cynefinoedd morol ac arfordirol wedi'u hadfer





Ministerial Priorities for the Climate Change, Environment, and Infrastructure Committee

We are writing in response to the Climate Change, Environment and Infrastructure Committee's call for evidence on priorities for the term of the sixth Senedd. Marine Energy Wales (MEW) welcomes the opportunity to represent our membership and provide feedback to this consultation around the opportunity of emerging offshore renewable energy in Wales. This is a sector which can deliver a meaningful contribution to the clean energy transition for Wales, anchor a burgeoning sector on Welsh shores providing economic development, regeneration and skills in Wales as well as a fulfilling a significant role in supporting a strong, green recovery from Covid-19 and a robust energy solution for climate change.

This consultation response seeks to provide a brief summary of the industry, to highlight the importance of the emerging offshore renewables sector to drive decarbonisation and the green recovery here in Wales, and to identify the Ministerial priorities that we would like to see in the next 12-18 months.

Marine Energy Wales

Marine Energy Wales (MEW) is *the* industry led stakeholder group representing the wave, tidal and floating offshore wind industries in Wales. **MEW brings together technology developers, test centres, wider sectoral alliances such as the Celtic Sea Developers Alliance and Tidal Range Alliance, the supply chain, academia and the public sector to establish Wales as a global leader in sustainable emerging offshore renewable generation.** MEW participate in, and contribute advice to key strategic projects underway in support of the sector such as MEECE, Tiger, Selkie, as well as the Celtic Sea Cluster and Celtic Sea Developer Alliance. MEW's vision is to create a thriving and diverse emerging offshore renewables industry in Wales, making a significant contribution to a low carbon economy.

The Welsh Opportunity

MEW champions a green economic recovery with emerging offshore renewable energy playing a pivotal role. Harnessing the power of the sea will provide a clean, low carbon and sustainable source to meet the UK's energy demands and contribute to a successful, resilient and diverse UK energy mix which aims towards net zero. Wales has a unique offer with abundant tidal, wave and wind resource right on our doorstep.

- **A Significant Resource** – Wales has significant, diverse wave, wind, tidal stream and tidal range resources. The UK's practical resource has been independently estimated at 15GW for tidal stream



and 23GW for wave energy¹ and approaching 20GW for tidal range including 6GW in Wales. There could be at least 50GW of electricity capacity available in the Celtic Sea in Irish and UK waters for floating wind².

- **People** – Wales has an experienced and skilled supply chain with extensive industrial and energy sector experience, which has already seen diversification into construction and deployment of emerging offshore renewable devices. With over 256 direct FTEs (with further indirect supply chain multipliers increasing this number), the sector is providing skilled employment, regeneration of peripheral communities and ports, and is encouraging low carbon economic growth in coastal regions across the country. Floating offshore wind alone is expected to generate 3000 jobs by 2030 *if* the early mover opportunity is seized. The Welsh supply chain has the capability, capacity and ambition to deliver emerging offshore renewable projects and the burgeoning industry offers real opportunities for local companies to diversify.
- **Developers** – There are 20 emerging offshore renewable technology and project developers actively progressing projects in Wales with seabed agreements in place for over 500MW of emerging offshore energy sites.
- **Test Centre Network and Demonstration Zones** – A number of test and demonstration sites are under development in Wales including the Pembrokeshire and Anglesey Morlais array scale Demonstration Zones, Marine Energy Test Area in Pembroke Dock and Ramsey Sound. These projects will provide test beds for innovative wave, tidal stream and floating wind technologies, enabling valuable learning across the sector and adding to the UK's world-leading test centre network. These will continue to attract not only the interests of UK based technology developers, but also further the inward investment successes already achieved from countries including Australia, Sweden, France and Spain.
- **Technology and Research** – Expert academic and world-class emerging offshore renewables research facilities at Swansea, Bangor and Cardiff universities including the Selkie Project and SEACAMS2.
- **Infrastructure** – Wales has eight strategically located ports and facilities sited along the North, West and South coast. R&D trials are currently underway to assess the potential opportunity that hydrogen production, storage and handling may also represent to Wales. There is significant storage and pipeline capacity at a number of Welsh ports which could represent a solution for alternative use of emerging offshore energy power; to be used to produce **green hydrogen** instead of being exported to grid. This green hydrogen could contribute to Ofgem's minimum 80TWh hydrogen requirement to decarbonise shipping and HGV sectors by 2050 in net zero scenarios³.
- **Grid Connection** – Wales has accessible 400kV transmission lines adjacent to resource areas which makes it stand out compared to other areas of the UK and Europe. Wales is a strategically important net exporter of power to the UK grid, generating more than double the electricity it consumes.
- **Two Strategic Alliances** - The Celtic Sea Alliance is a collaboration programme between Cornwall, Wales and Ireland to progress the development of utility scale Floating Offshore Wind development

¹ ORE Catapult (2018) [Tidal stream and wave energy, cost reduction and industrial benefit](#)

² ORE Catapult (2020) [Supply Chain Report. Benefits of floating offshore wind to Wales and the South West](#)

³ National Grid (2020) [Future Energy Scenarios](#)



in the Celtic Sea. The Tidal Range Alliance works to highlight the scale, capacity, reliability and energy security/stability offered by tidal lagoons and barrages. It aims to demonstrate how tidal range projects will help to meet future electricity demand in a way that is compatible with climate change commitments and will be multi-functional (energy, environment, flooding protection and mitigation) and multi-generational.

- **The formation of cross border clusters** - MEW is a member of the Celtic Sea Cluster, which is part of the wider group of UK clusters supporting the development of offshore wind energy under the UK government's Sector Deal. The South West Industrial Cluster is also exploring mechanisms for decarbonising heavy industry in Wales including using emerging offshore renewable solutions to produce hydrogen.
- **Swansea Bay City Deal and North Wales Growth Deal** – The £60 million City Deal PDM project includes a UK Catapult led Marine Energy Engineering Centre of Excellence based in Wales, Marine Energy Test Area, Pembrokeshire Demonstration Zone and port infrastructure upgrades to develop a hub for marine energy in Pembrokeshire. There will also be tidal energy opportunities for the Morlais project through the North Wales Growth Deal.

Emerging offshore renewable energy presents an opportunity for Wales to **keep its own renewable energy technology value locally by supporting a currently homegrown industry to deliver a low carbon economy, with its own jobs and prospects, and export the knowledge, skills and expertise globally**. All whilst delivering a number of technological **solutions for the clean energy transition and decarbonisation of industry**.

Ministerial Priorities

In their letter, the Minister and Deputy Minister outlined that to support energy system transitions within the wider net zero agenda, we need to transfer to renewable sources of power and that energy generation must evolve in line with these wider changes. Marine Renewables **contribute to a diverse and resilient energy mix**. The wind does not always blow and the sun does not always shine. Marine renewables can address fluctuations in these energy sources to ensure that the lights stay on. They also enable **energy independence by reducing our reliance on fuels imported from abroad**. Generating power from **multiple diverse sources** is key to delivering a continuous uninterrupted supply of renewable energy to our homes.

The letter also references the Welsh Government's Marine Energy Programme, which we have been very enthusiastic to support, providing an interface to the marine renewable energy sector and seeking to understand ways in which Welsh Government can accelerate progress for the sector.

Despite a natural competitive advantage, innovative initiatives within the sector, and significant maritime experience developed over centuries, the **Welsh evolution of our energy generation is currently falling behind other areas of the UK and international competition due to a challenging consenting regime, slow delivery of policy intent and insufficient investment in infrastructure**. Resulting in the potential forfeit of the associated jobs, prosperity and economic growth for Wales as well as the provision of secure and predictable energy to the energy mix. Thus we risk once inherent strengths, including know-how, technology, economic value and employment prospects, leaving Wales and being drawn overseas.

With adequate and consistent policy and financial support from government, we will be able to capitalise on this innovative maritime opportunity that supports supply chain resilience and clusters, in some of our most peripheral economies across Wales. Which, we are already seeing, represents significant global export potential.

Wales' ongoing ability to benefit from this new low carbon opportunity will ultimately depend on;

- the delivery of government policy in support of clean technology deployment.
- timely deployment of our technology that is not unduly constrained by the consenting regime;
- ensuring the infrastructure required to build the technology and export the power is available at the right time and to the right scale;
- enabling the upskilling and up-tooling of our supply chains; and
- a renewed approach to the opportunity of tidal range in Wales.

The overarching asks of the sector are set out below to provide context. Appreciating that some of these have long timeframes associated, suggestions for Ministerial prioritisation for the next 12-18 months are provided in bold.

Revenue support for wave and tidal stream projects - Continue to work with the rest of the UK to make a case at UK Government level to secure meaningful revenue support for wave & tidal stream technology through the Contracts for Difference (CfD) Scheme and Innovation Power Purchase Agreement (IPPA). Noting that an announcement is anticipated in the coming months around the CFD provision, whilst focus needs to be maintained on BEIS we have initiatives underway that can further support and accelerate progress in this regard. The Minister should seek to **support the Marine Energy Programme activities to provide a Welsh specific revenue support mechanism for early-stage technology projects in Wales to bridge the gap between grants and the CfD**. In combination with the CFD announcement the market signal and impetus that this would build for the sector could be considerable, anchoring technology companies in Wales that may otherwise be considering European relocation options to make securing grant funding easier.

Consenting and Evidence – We would welcome **increased support through both funding and personnel resources at the regulator, Natural Resources Wales (NRW)**. In order to ensure suitable and appropriate allocations, an **in-depth assessment of the delivery and timeframes associated with consenting** is recommended. NRW needs support from Government policy in order to make timely and pragmatic decisions and to collaborate further with the sector. A **clear mandate for NRW** to enable the deployment of more devices in the water, would result in an increased availability of evidence to progress the industry which currently poses a significant constraint to timely deployment and thus the appeal of development in Welsh waters. The Committee should simultaneously pursue the **prioritisation of the introduction of the Wales Infrastructure Consenting bill** at the earliest opportunity within the Senedd term to enable the existing arduous consenting processes to become streamlined and efficient.

Infrastructure and Supply Chain – A focus on the timeline for the **building of required infrastructure and developing grid capacity** is key to enable the growth and progression of the industry to deliver projects and the timely energy transition referenced in the Ministers' letter. Port development needs to be able to accommodate large scale technology components to be able to maximise opportunities for the sector in the 2030s. Furthermore, to address grid constraints integration with broader SMART energy systems and with the hydrogen economy should be encouraged. **Timely delivery of recommendations to Welsh Government's reports undertaken on grid and ports** should be encouraged by the committee. Support Welsh supply chain companies to become competitive through improved infrastructure and training, and wider initiatives to grow the skills needed to support the marine energy sector; using stepping stone projects to build capacity.

Celtic Sea – Encourage the UK Government to implement a **CfD system that supports the use of local supply chain even if it is more expensive to do so**, recognising the potential GVA benefits associated. Invest in ports to enable solutions that bring decarbonisation, regeneration and economic benefits to Wales. **Engage with The Crown Estate (TCE) to ensure that opportunities for 'early commercial stepping stone' floating offshore wind projects in the Celtic Sea are delivered through a timely leasing framework for**



generation up to 300MW in output. Support the development of the Celtic Sea as a floating wind development zone; working in collaboration with Ireland and the South West of England.

Tidal Range - Wales can lead the way in developing the necessary framework to demonstrate the value of tidal range to the UK. Rather than concentrating on simple cost of energy models, there **needs to be broad recognition of tidal range's unique multi-generational operating life, extensive co-benefits and contribution to Wales and the UK's energy security, stability and Net Zero targets.** We support the ongoing activities of the Marine Energy Programme and emphasise the need for a **fresh assessment of tidal range**, recognising these factors and using up-to-date independent engineering and financial models would not only provide the much-needed evidence needed to compare tidal range's unique features and benefits against other forms of low-carbon energy, but also provide the technical, environmental and financial models to guide Government and investor decisions.

Overall, we believe the committee must scrutinise the efficacy of Wales' efforts to both deliver and anchor this sector of significant promise here, in Welsh waters and on Welsh soil. After such commitment and support in recent years, the timely delivery of policy impact and a coordinated strategic approach to the ability to deploy in Welsh waters and achieve timely project development must be achieved. So that Wales' contribution to, not only national decarbonisation, but also to delivering solutions that can be used on a global scale to make a meaningful Welsh contribution to Climate Change.

We would welcome the opportunity to present the case for marine renewable energy and the sector asks of Welsh Government in more detail at any oral evidence sessions which result from this consultation. We look forward to continued engagement with the Climate Change, Environment and Infrastructure Committee on this emerging sector and the opportunities it presents.



Blue Gem Wind

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Blaenoriaethau ar gyfer y Chweched Senedd / Priorities for the Sixth Senedd
PR19
Ymateb gan Blue Gem Wind / Evidence from Blue Gem Wind

Llyr Gruffydd MS
Chair of the Climate Change, Environment and Infrastructure Committee
Welsh Parliament
Cardiff Bay
CF99 1SN

8th September, 2021

Dear Llyr,

Ministerial Priorities in Relation to Climate Change, Environment and Infrastructure

We are writing in response to the Climate Change, Environment and Infrastructure Committee's call for evidence on priorities for the term of the sixth Senedd. Blue Gem Wind welcomes the opportunity to outline its view on the strategic priority for the Committee in order to promote economic development, regeneration and skills in Wales and the role that the deployment of floating offshore wind can play in supporting a strong, green recovery from Covid-19.

Blue Gem Wind

Blue Gem Wind is a joint venture between Simply Blue Energy, a pioneering Celtic Sea energy developer, and TotalEnergies, one of the world's largest energy companies. Blue Gem Wind is currently developing two floating wind sites with a combined capacity of ~400MW in Welsh waters of the Celtic Sea. The first project, Erebus (96MW), is Wales' first floating offshore wind farm c.45 km off the Pembrokeshire coastline and will provide enough energy for 90,000 homes. The second, larger project, Valorous (300MW), is to be located c.50 km off the Pembrokeshire coastline and will provide enough energy for 280,000 homes. Combined, these projects represent international inward investment of over £2.5 billion.

Blue Gem Wind's development focus is on maximising opportunities for the supply chain. A stepping stone approach, whereby floating wind projects progress from initial test and demonstration scale projects to larger early-commercial developments, will help to capture the

Blue Gem Wind Ltd.

Company registered in England and Wales.

Company Number: 11116383.

Registered Address: Bridge innovation Centre, Pembrokeshire Science & Technology Park,
Pembroke Dock, Wales, SA72 6UN

Tudalen y pecyn 42



Blue Gem Wind

highest local supply chain content for the projects that follow. This approach was adopted in response to a report by the Offshore Renewable Energy Catapult (OREC) for the Crown Estate

Scotland in 2018¹, that identified stepping stone projects as the best way to enable local supply chain growth in this new sector.

Floating Wind

For us, floating offshore wind combines two technologies that have been proven throughout the world, oil and gas platform technology and wind turbines. This means we can move into deeper waters with higher wind speeds and less visual impact. With 80% of the world's wind resource in water deeper than 60 meters (the current maximum for fixed offshore wind) floating wind is set to become a key technology in reaching Net-Zero and delivering the 100GW of offshore wind recommended in the recent Climate Change Committee's Sixth Carbon Budget.

Independent studies have suggested there could be as much as 50GW of electricity capacity available in the Celtic Sea waters of the UK and Ireland which is a significant low carbon resource at a UK level. This will allow Wales to maximise the estimated job creation of 17,000 UK jobs generating £33.6 billion for the UK economy by 2050.²

Floating Wind is predicted to reach subsidy free levels by the early 2030's.³

Economic Benefits and a COVID Green Recovery

There is a tangible opportunity for the Welsh Government, Local Governments, LEPs and the UK Government to work together to deliver and implement the policy and infrastructure changes needed to deliver a long-term pipeline of sustainable, home-grown projects in Welsh waters of the Celtic Sea. This will create an industry that could also export to Ireland and further afield as the sector develops internationally. A report by the Offshore Renewable Energy Catapult (OREC) focusing on supply chain opportunities, produced for the Welsh Government and the Cornwall and Isles of Scilly Local Enterprise Partnership, identified that floating offshore wind projects in the Celtic Sea could support 3,200 jobs in South West England and Wales and bring £682m in benefits to the local supply chain by 2030 for the first GW of deployment⁴.

¹ https://ore.catapult.org.uk/wp-content/uploads/2018/10/PN000244-FWMS-Report_FINAL-1.pdf

² https://ore.catapult.org.uk/wp-content/uploads/2018/10/PN000244-FWMS-Report_FINAL-1.pdf

³ <https://ore.catapult.org.uk/press-releases/uk-floating-offshore-wind-subsidy-free-2030/>

⁴ <https://www.marineenergywales.co.uk/wp-content/uploads/2020/01/Benefits-of-Floating-Offshore-Wind-to-Wales-and-the-South-West.pdf>



Blue Gem Wind

OREC produced results from similar, project-scale, analysis in 2021 stating the Erebus project would support up to 1100 Full-Time Equivalent (FTE) job-years during construction and 73 long-term jobs annually during operation. Furthermore, Erebus would generate £182m in GVA from CAPEX and £9m annually from OPEX for the local and UK economy.

The Committee should look to examine how the economic development opportunities brought by floating offshore wind projects can be maximised with regards to Welsh supply chains and jobs.

Ministerial Priorities for the Next Twelve to Eighteen Months

Blue Gem Wind welcomes the Ministerial commitments to renewable energy generation, in particular its developing marine energy programme, assuming Floating Wind is part of the marine energy programme.

Infrastructure Investment

We agree with the Minister's assessment that 'infrastructure investment provides an important and much needed stimulus' and believe that this should be a high-priority in this term for the Welsh Government. In order to achieve this, it is critical that Ministers work with the UK Government to design the most appropriate investment scheme that facilitates supply chain growth and brings jobs.

- **Examine the economic development potential brought by floating offshore wind in the Celtic Sea and make recommendations to the Welsh Government on the actions required around port infrastructure investment that will facilitate supply chain growth.**

A key focus of the Committee should be to scrutinise the action by the Welsh Government in cooperation with the UK Government in the area of supply chain development and support. This should focus on port upgrades to ensure that the ports are fit for purpose for floating wind. It is understood that the £160m funding being invested by the UK Government port infrastructure for offshore wind is destined for the east coast of England but further port investment should be encouraged for the Celtic Sea ports through subsequent rounds.

There is the opportunity for a collaborative approach to a port strategy in Wales to support renewables and the Economy, Trade and Rural Affairs Committee should seek to work possibly in conjunction with the Climate Change, Environment, and Infrastructure Committee to understand the potential for co-investment in ports between Welsh and UK Governments.

This collaborative approach has proved successful for the recent Pembroke Dock Marine project as

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part of the Swansea Bay City Deal. The role ports will play in local supply chain benefits cannot be overstated and currently there are challenges for Welsh ports to support, in particular, the fabrication and integration of platforms and wind turbines due to the scale and development of floating wind.

Blue Gem Wind's projects could potentially add significant value and de-risk Government investment in Pembroke Dock Marine but to maximise the opportunity to Wales more port infrastructure investment is required and a careful examination of the barriers to this will be useful in maximising the economic development opportunities.

Stimulating Marine Energy Generation

In order to ensure that floating offshore wind projects in the Celtic Sea are able to play their part in the Welsh Government's ambition for renewables to generate an amount equivalent to 70% of Wales' electricity use by 2030 and create jobs and investment opportunities alongside, Blue Gem Wind recommends that Ministers and your Committee:

- **Engage with The Crown Estate (TCE) to ensure that opportunities for 'early commercial stepping stone' floating offshore wind projects in the Celtic Sea are delivered through a timeous leasing framework for generation up to 300MW in output. Once this 'early-commercial' leasing framework is complete, a floating wind commercial scale leasing process should be progressed as soon as possible otherwise Wales will be disadvantaged vis a vis with Scotland who already have a commercial scale leasing round for floating wind and 2 floating wind projects fully commissioned.**

Seabed leasing and site security provided by The Crown Estate are vital to providing confidence to investors in floating offshore wind. The success of projects in the Celtic Sea is based upon a stepping-stone approach, whereby projects and the associated supply-chain are able to gradually scale-up, starting at ~100MW, moving to ~300MW, before taking on full-scale commercial projects. At present, The Crown Estate (TCE) provides a leasing mechanism for 100MW which Blue Gem Wind has used for its first site, Erebus (96MW). After this, there is currently no live process for floating wind projects to achieve a seabed lease in Welsh or English waters.

Encouragingly TCE launched a call for evidence in December 2020 for "early-commercial sites". This was followed by an announcement in March 2021 that The Crown Estate will be commencing work to create a new leasing framework for early commercial-scale floating offshore wind projects in the Celtic Sea up to 300MW in output. Ministers should be focused on highlighting the importance of timeous decision-making by TCE and value brought by effectively supporting the stepping-stone approach.

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- **Engage with the UK Government to ensure that the Contracts for Difference (CfD) scheme incentivises the use of local supply chain strategies and maximises the economic benefit to Wales.**

For floating offshore wind, revenue support will be required for at least the next ten years and we have supported the UK Government's decision to include floating wind in CfD Pot 2 along with other small scale or innovative technologies from Allocation Round 4 onwards. We believe that the Department for Business, Energy and Industrial Strategy has all the required capabilities being able to set pot capacities, create minima and maxima and use Administration Strike Prices (ASPs) to ensure the delivery of project at suitable value for money but it is important this is done in the context of a local supply chain strategy.

The two Blue Gem Wind projects will be, it is believed, each competing with similarly sized projects in Scotland. Wales and Scotland are keen to build up their supply chains for FLOW and it is important that the CfD competition in Allocation Round 6 (2025) is not set so that only one project and thus one region can be successful. The Welsh Government should be focused on maximising the economic value brought to Wales by FLOW through its supply chains and it is critical that Ministerial engagement around future revenue support system design takes place with this in mind.

Other areas for consideration

Grid will require significant investment and strategic planning and could be a barrier to maximising the economic opportunities for Wales. Planning and NRW's role in providing timely consent decisions is also critical for Wales. Skills, training and diversification for a new floating wind sector is essential to capturing the economic benefits

We would welcome the opportunity to present in more detail the case for port infrastructure investment and supply chain contribution to economic development at any oral evidence sessions which result from this call for evidence. Should you have any questions, or wish to discuss the contents of this response, please contact david.jones@bluegemwind.com

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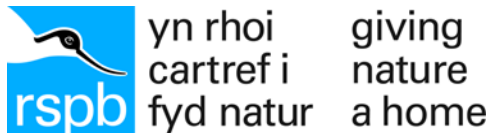
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RSPB Cymru submission on Priorities for the Climate Change, Environment and Infrastructure Committee

10 September 2021

RSPB Cymru is grateful for the opportunity to provide input to the Committee’s planning for the next 12-18 months. As the Chair and members of the Committee are well aware, we are at a critical moment for Wales, and the world, to respond to the climate and nature emergency. The decisions made by the Welsh Government and the Senedd in the coming months and years will determine whether Wales succeeds or fails in turning around biodiversity decline and delivering our net zero target.

[The global agenda: COP15 and COP26](#)

The two forthcoming global summits – COP15 of the UN Convention on Biological Diversity (CBD) and COP26 of the UN Framework Convention on Climate Change - provide a strong frame for the Committee’s agenda, and no doubt the Committee will wish to give attention to these key moments – and the resulting new global agreements – and the Welsh Government’s input and response.

The world’s leading biodiversity and climate experts articulated a key challenge earlier this year. The [joint report published by IPBES & IPCC](#) states that biodiversity loss and climate change are both driven by human economic activities and mutually reinforce each other. Neither will be successfully resolved unless both are tackled together. There are many potential win-wins in tacking climate and nature together, but narrowly-focused actions to combat climate change can directly and indirectly harm nature, and vice-versa.

[Welsh Government Well-being Objective to embed response to climate and nature emergency](#)

The Welsh Government has [committed](#) to “embed our response to the climate and nature emergency in everything we do”. This objective clearly applies across all government departments, and we would encourage the Committee to consider how it might support and scrutinise Welsh Government in its delivery of this objective, and/or support other Committees in doing so. Delivering on this objective must not be limited to considering how to *avoid or mitigate harm* to biodiversity in departmental priorities, but also how to *contribute to (and invest in) nature’s restoration and recovery*. We believe this is less well-developed across Welsh Government than is the practice of considering decarbonisation targets, (we consider the development of legally binding nature recovery targets will support this integration in the longer term).

Consideration of this objective could usefully help to frame the Committee's consideration of the Welsh Government budget, deep dives undertaken by Ministers, and initiatives developed as part of a green recovery.

Legislation on environmental governance, principles and nature recovery targets

We were delighted by the support shown for the recent [Senedd motion](#) declaring a nature emergency, which also called for parity between Welsh Government actions to tackle climate change and biodiversity loss. Many Senedd members spoke during the debate with passion and conviction about the need to do more for nature. We were also pleased that the CCERA Committee [Fifth Senedd Legacy Report](#) contained a clear recommendation underlining the importance of nature recovery targets.

The Minister has indicated her intention to bring forward an environmental governance bill which would also provide a potential vehicle to set the framework for legally binding nature recovery targets; a prospect we warmly welcome and support.

We are, however, concerned that this Bill did not feature in the legislative programme for Year 1 of the Senedd term, and that the Minister has offered no guarantee that time will be found in Year 2. Wales has fallen well behind the rest of the UK on environmental governance, resulting in a *de facto* weakening of environmental protection post EU exit. It is vital that the legislation to close this gap is prioritised by Welsh Government and allocated the resources necessary to bring it forward early in the second year of the Senedd. We would urge the Committee to seek regular updates from Government on this matter.

We also see no reason to delay legislation (via the same Bill) that would set a framework for nature recovery targets. The Minister has indicated she is keen to first see the post-2020 global biodiversity framework. While we agree that Wales' targets must take account of this, it is both possible and important to progress work on the Welsh primary legislation before the conclusion of negotiations. As one of the [world's most nature-depleted countries](#), it is clear that Wales must be prepared to lead by setting strong domestic ambition. (While the Ministers' submission refers to the Nature Recovery Action Plan it is important to note that this plan does not include any SMART targets or compel specific actions, nor do we consider it has a reach beyond the nature/land use focused government departments).

As set out in the RSPB Cymru / WWF Cymru report '[Putting Wales on Path to Nature Recovery](#)', Wales should move ahead immediately with setting a high level framework for targets in primary legislation, with a detailed suite of SMART long term and interim targets to follow in secondary legislation. We believe the primary legislation should include an overarching new duty on the Welsh Government to halt and begin to reverse the loss of biodiversity by 2030 (aligning Wales with the [G7 2030 Nature Compact](#)) and achieve substantive recovery by 2050.

Additionally, we note that commitments to protect 30% of land and sea for nature by 2030 (the 30x30 target) have been made by UK, Scottish and Northern Irish Governments, but we have not yet seen a formal commitment from the Minister to achieving this in Wales.

Green recovery

The [Dasgupta Review](#) into "The Economics of Biodiversity" describes nature as our most precious asset, and calls for [transformative change in how we recognise and value nature](#). A recent RSPB Report shows the **significant return that can be gained from investing in our natural assets: for every £1 invested in peatland, salt marsh and woodland respectively can secure £4.62, £1.31 and**

[£2.79 in return](#). Moreover, RSPB Cymru has estimated that an investment in nature restoration could support almost [7,000 direct FTE jobs in Wales](#).

Tackling the nature and climate emergency will require coordinated attention across committees, and we would encourage the CCEI Committee to revisit [recommendations made by the previous Economy, Infrastructure and Skills committee](#) in November 2020 (ideally in tandem with the current ETRA Committee), including the recommendations to “**invest in a transformation green recovery**” through:

- **Investment in and acceleration of ‘shovel-ready’ green infrastructure.** This refers to **nature-based solutions** such as peatland, salt marsh or woodland outlined above. Large scale habitat restoration is necessary to support adaptation to climate change as well as contributing to mitigation, and to reversing biodiversity loss. Peatland restoration is particularly important due to potential emissions from degraded peat (whereas peat habitats in good condition help to sequester carbon, as well as providing other ecosystem services).
- Skills funding to support green jobs and “take robust action to analyse and address the disparities between current and future needs and existing skills provision”. This could, in part, be fulfilled by an **investment in a National Nature Service** as proposed to Welsh Government by the NRW Green Recovery Delivery Group.

When coupled with investment in nature’s restoration, a National Nature Service will further assist a just transition into green jobs for the future, while ensuring that nature remains at the heart of a green and just recovery.

The importance of robust planning for decarbonisation in harmony with nature

In tandem with demand reduction and nature-based solutions, the need to rapidly decarbonise the energy system is well understood. Robust and accountable land- and sea- use planning are essential to enable this transition to take place in a way that does not exacerbate the crisis of biodiversity loss. Potential impacts to ecosystems from development include wildlife collision, disturbance, habitat loss, and loss of access to preferred foraging areas (displacement). The Minister has spoken of some of the difficult choices that lie ahead (for example in her July statement on the [Gwent Levels](#)), but it is imperative that robust, forward looking development plans are utilised to their full potential to enable decision makers to make the best, strategic choices with the best possible understanding of opportunities and impacts.

Strategic spatial planning is essential to:

- establish the capacity for development within an area;
- guide the siting of developments away from the most ecologically sensitive areas;
- assess and minimise the cumulative impacts on habitats and species;
- identify and secure opportunities for net biodiversity benefit;
- in doing the above, provide greater certainty (in terms of deliverability of renewable energy projects) to developers and other sectors.

We would welcome consideration of marine planning by the Committee, an area which has relevance across the breadth of the Committee’s remit. During the consultation on the draft Welsh National Marine Plan (WNMP), the former Climate Change, Environment and Rural Affairs Committee held a **one-day workshop** on this. Since the WNMP was developed, ambitions for development (particularly renewables) in Welsh seas have grown significantly. While it is encouraging to see the Ministers’ comment (in their letter to the Chair of 30 July) that effective

marine planning and regulation is crucial for sustainable marine sector growth, particularly marine renewable energy, it must be urgently noted that the WNMP is not currently fit for this purpose. The WNMP does not have a spatial component or development control policies, and therefore does not embed strategic forward planning or seek to proactively address conflict.

We therefore believe a follow-up session on marine planning is timely and urgent (a similar format to the previous workshop would work well). The marine environment is not currently resilient and a [recent evaluation](#) shows that the status of some species, such as seabirds, is worsening. As Welsh seas become more crowded, we believe the marine planning system must operate at a strategic and spatial level to ensure that marine development ambitions are delivered in a way which does not further hinder the achievement of [Good Environmental Status](#).

While the terrestrial planning system is a world away from the WNMP, and much more focused on spatial allocation from national through to local level, it is still the case that developments of national significance come forward outside of this context so that overall capacity and cumulative cross sector impacts are not assessed at a strategic level. As in the marine environment this leads to a higher likelihood of dispute over developments in ecologically sensitive areas (including designated sites); concerns over cumulative impacts; and higher uncertainty for all parties.

The development of a robust, regulated approach to securing **net biodiversity benefit from development** would present an opportunity to secure funding for nature's recovery, and would merit the Committee's attention.

Investment in nature delivery

In recent years we have seen a welcome uplift in the budget allocation for designated sites, and the Welsh Government's new Nature Networks programme is continuing to move this agenda in a welcome direction by considering multi-year funding for much needed action to improve the condition of our designated sites and the wider ecological networks they are a part of. This notwithstanding, it is clear that the anticipated funding is much lower than what is needed – for example, in 2015, an [EU LIFE funded report published by NRW](#) estimated that the actions needed to attain favourable conservation status of Wales' Natura 2000 sites would cost £144 million to 2020 (noting that this figure does not include staff time or ongoing, currently funded (at the time) management work).

A critical part of putting nature conservation funding on a more sustainable footing will be clarifying the connections with other Welsh Government policies – for example, the new Sustainable Farming Scheme and the National Forest.

However, there is no escaping the fact that Natural Resources Wales has received a budget cut in real terms of 35% between 2013 and 2020¹. It is deeply concerning that around 50% of terrestrial protected site features are in unknown condition as cuts have left NRW unable to monitor these most important places for nature². Fewer than 6% of SSSIs have a management agreement in place involving NRW. NRW resourcing must be scaled up urgently in recognition of the scale of the challenge that we must meet to halt and reverse biodiversity loss.

¹ According to Emma Rose (Unchecked UK) 2021 report [Safeguarding Standards – Why Wales should lead the way](#)

² <https://naturalresources.wales/evidence-and-data/research-and-reports/protected-sites-baseline-assessment-2020/?lang=en>

We note that Natural England is now receiving a 47% increase in Government funding after the Chair of Natural England [stated](#) to the Environmental Audit Committee that budget cuts had left the agency's funding "below the level required to deliver all of our statutory duties to a good standard". While the increase to Natural England's budget still leaves it with less funding than it received in 2008/09, it is at least some recognition that years of underinvestment must be reversed for agencies to be able to deliver their statutory duties.

There is no doubt that financing nature's recovery will need to involve innovative approaches enabling private sector investment; but Welsh Government must also face the need to increase public investment in the resources (including human resources) needed to deliver this successfully. We would urge the CCEI Committee to bring these considerations into its work around the Welsh Government budget.

Work with other Committees

While we appreciate the CCEI Committee's remit is very broad, there are key policies linked with addressing climate change and nature loss that sit outside of it. For example, development of a National Nature Service (as referenced above) would entail commitment from the Economy Department with scrutiny by the Economy, Trade and Rural Affairs (ETRA) Committee, but would benefit from the CCEI Committee's expertise in nature and climate action.

Fisheries and farming are two further priority areas which are critical to nature's recovery and where joint working between the CCEI Committee and the ETRA Committee may be advantageous, in particular on:

- **The Joint Fisheries Statement (JFS) and Fisheries Management Plans (FMPs)** under the 2020 UK Fisheries Act **which will set out post Brexit fisheries management in Wales. There is a requirement, within the Act to lay a consultation draft of the JFS before the appropriate legislature. This is expected in early 2022.** Given the significance of the JFS for determining long-term fisheries management policies, Committee scrutiny will be of the utmost importance.
- **The Agriculture (Wales) Bill and Sustainable Farming Scheme.** The introduction of a new Agriculture Act for Wales provides a unique opportunity to transition to and reward sustainable farming and land management that restores nature, tackles climate change and provides society with a wide range of essential public goods. This piece of legislation will play a critical role in determining the state of Welsh ecosystems on which we and future generations depend.

For further information, please contact Annie Smith – annie.smith@rspb.org.uk

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Blaenoriaethau ar gyfer y Chweched Senedd / Priorities for the Sixth Senedd
PR81

Ymateb gan Y Gymdeithas Cadwraeth Forol / Evidence from Marine Conservation Society



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The Marine Conservation Society (MCS) welcomes the opportunity to feedback to the Climate Change, Environment and Infrastructure Committee (hereafter “the Committee”) on priorities for the Sixth Senedd term (2021-2026).

MCS is the UK’s leading marine conservation charity. We work to ensure our seas are healthy, pollution-free and protected. Our vision is for seas full of life where nature flourishes and people thrive. We have actively been working in Wales to improve the health of Welsh seas for the past 30 years.

Summary of recommendations for the next 12-18 months

Marine Energy:

- Investigate how marine development can occur without causing irreversible environmental damage

Net Zero:

- Explore the design, implementation and funding of a National Blue Carbon Recovery Plan

Nature and Biodiversity:

- Scrutinise the designation and management of Wales’ Marine Conservation Zone process
- Co-inspect the UK Joint Fisheries Statement and Fisheries Management Plans alongside the Rural Affairs Committee once available

Circular Economy:

- Hold Welsh Government to account on timelines and implementation of an all-inclusive Deposit Return Scheme and Single-Use Plastic bans
- Ensure full alignment with EU REACH regulations, including restrictions on intentionally added microplastics, PFAS in non-essential uses and other harmful contaminants

Tackling Climate Change in harmony with nature: Marine Spatial Planning

“Effective marine planning for, and regulation of, new development is crucial to enabling sustainable marine sector growth, particularly for the development of marine energy projects to contribute to net zero.” - Minister for Climate Change on the Welsh Government priorities, July 2021

We welcome the Welsh Government’s ambition to deliver renewable energy to the equivalent of 70% of Welsh homes by 2030. We note the ambition for the growth of marine renewable energy to meet these commitments. Whilst it is true that marine renewable energy will have a key role to play

in the move away from Wales's dependency on fossil fuels, development of this type of energy is not without its challenges - particularly, avoiding destruction and disturbance to marine life and the habitats on which they depend. We cannot allow the need for marine renewable energy to exacerbate the nature emergency we are experiencing in Wales.

We recommend that the Committee considers investigating how the ambition for marine renewable energy in Wales can be realised without causing irreversible damage to Marine Protected Areas.

Tackling Climate Change in harmony with nature: Blue Carbon

"... we also need to understand what the seas already deliver for us in terms of carbon sequestration and to enhance that where we can, and to stop degrading it in ways which are utterly unnecessary." - Minister for Climate Change, MCS Sensational Seas Event, June 2021

It is encouraging that the Minister recognises the importance of our blue carbon habitats in sequestering carbon. In order to meet the ambitious target to becoming carbon net-zero by 2050, it is critical we look towards the ocean and its immense carbon storing capabilities. An NRW-commissioned report in 2020 revealed that blue carbon habitat in the Welsh National Marine Plan area presently stores at least 10 years' worth of Wales' carbon emissions. Not only do these habitats act as effective carbon stores, but equally are efficient at absorbing storm energy; thus, acting as a natural flooding solution.

We recommend the Committee explore the development, implementation and funding of a National Blue Carbon Recovery Plan designed to maintain and enhance our invaluable marine blue carbon habitats.

Restoration and protection of one of Wales's most important natural assets – the marine environment

"Our vision for our seas is that they are clean, healthy, safe, productive, and biologically diverse. Wales has important marine habitats, such as seagrass forests and saltmarshes. Our approach is structured around assessment, protection and management, and restoration." - Minister for Climate Change on the Welsh Government priorities, July 2021

We welcome the Minister's continued commitment to seas that are "clean, healthy, safe, productive and biologically diverse" (a commitment made by all four UK nations within the UK Marine Policy Statement, 2011). Given that the Minister does not elaborate on priorities here, we thought it would be useful to set out our priorities for the Committee:

We recommend that the Committee scrutinises the identification, designation and management of the Marine Conservation Zones process in Wales over the next 12 months. The process of identifying sites is already severely delayed in Wales.

The Committee should work with the Rural Affairs Committee to consider scrutinising the UK Joint Fisheries Statement and the Fisheries Management Plans once these are made available.

Moving towards a Circular Economy – introducing waste reduction legislation

“The government has committed to bringing forward legislation to ban more single use plastics however the implications the Internal Market Act 2020 might have on these proposals is not yet clear.” - Minister for Climate Change on the Welsh Government priorities, July 2021

The introduction of key legislation such as an all-inclusive Deposit Return System (DRS) and bans on single use plastic items has been significantly delayed for a number of years. While we appreciate the complications that might be posed by the Internal Markets Act, Wales cannot afford to delay further in the face of a Climate and Nature Emergency.

“Maintaining and enhancing our dynamic water ecosystem is central to tackling the wider strategic challenges we face. We need to ensure our drainage and sewerage systems are sustainable, managed effectively and that they are fit for purpose in terms of meeting changing demands.” - Minister for Climate Change on the Welsh Government priorities, July 2021

We welcome the Minister’s recognition that effective management of drainage and sewage systems is fundamental in protecting our water ecosystems – both freshwater and marine. To ensure that drainage and sewage systems are “sustainable”, contaminants must be prevented from entering wastewater systems at source. For additional information, please see our recently published [sewage sludge paper](#).

Additionally, a clean and safe circular economy must be free from harmful chemicals such as PFAS. As [summarised by the UK Government](#); “PFAS are a group of over 9,000 different chemicals, some of which are already banned or highly restricted. In industry, these substances are used as stain repellents, coatings and fire-fighting foams. The chemicals in PFAS are extremely persistent in the environment; the substances can accumulate in animals and can also be toxic this means PFAS are of growing concern for both human health and environmental reasons.” A truly circular economy cannot be achieved while chemicals such as PFAS continue to accumulate in our environment.

We recommend that the Committee holds Welsh Government to account on timescales for the introduction of much-delayed and much-needed legislation on an all-inclusive Deposit Return System and bans on single use plastic.

The Committee should work with Welsh Government to keep fully aligned with EU REACH regulations, including restrictions on both intentionally added microplastics and PFAS in non-essential uses amongst other harmful contaminants.

Thank you again for the opportunity to provide the above comments. If you have any further questions with regards to our feedback above, please do not hesitate to contact me.

Yours sincerely,

C. Trotman

Clare Trotman Policy and Advocacy Manager (Wales)

Marine Conservation Society



Introduction

Thank you for the opportunity to submit views to the Committee on its priorities for the Sixth Senedd. In establishing the new Ministry for Climate Change Environment and Infrastructure the First Minister [committed](#) to putting the environment, biodiversity and climate change at the heart of decision making. Whilst we recognise that the [paper](#) outlining the Minister and Deputy Minister's portfolio priorities for the next 12 – 18 months sets out a series of focus areas and not necessarily a comprehensive schedule, it does omit key areas of work.

Nature and climate emergency

Wales Environment Link welcomed the Senedd declarations, backed by the Welsh Government, of first a climate emergency and, more recently, a nature emergency. The role of this Committee, and of this Senedd, in setting the course to ensure Wales' response is ambitious enough to address this challenge, could not be more critical, and the ongoing work towards new global agreements on climate change and biodiversity provides critical context for the Committee in determining its priorities.

In June 2021, [IPBES & IPCC published a joint report](#) based on a [workshop](#) bringing together the world's leading biodiversity and climate experts. The report states that biodiversity loss and climate change are both driven by human economic activities and mutually reinforce each other. Neither will be successfully resolved unless both are tackled together. Further, while there are many potential win-wins in tacking climate and nature together, narrowly-focused actions to combat climate change can directly and indirectly harm nature and vice-versa. Examples of climate change measures that have potential to harm nature are planting trees in inappropriate places; monoculture afforestation; and poorly located renewable energy infrastructure.

The Welsh Government's commitment to integrating the response to the climate and nature emergency across all activity is very welcome. This Committee will have an important role to play in ensuring this is effectively delivered, and that nature recovery as well as climate objectives are mainstreamed across government.

Reviewing environmental law, Natural Resources Wales and regulatory bodies

In recent evidence sessions at the Senedd the Minister for Climate Change Julie James MS confirmed that the Welsh Government is undertaking a "review of where regulatory bodies sit together – Welsh Government, Natural Resources Wales, local authorities and various other statutory bodies". Presumably this follows calls from the Welsh local government association to review the functions of NRW specifically in relation to flood management. During the [JLC Committee 120721](#) the Minister also stated that Officials had been asked to "scope out a possible review of environmental law in Wales." Although no further details of these reviews are available and therefore their scope remains unclear, these are potentially significant areas of work that should be of interest to the Committee. In this context we note that the Senedd has not to date undertaken post legislative scrutiny of the Environment Wales Act 2016, which created a new statutory purpose for Natural Resources for Wales and the statutory framework for the sustainable management of natural resources. Scrutiny of the implementation of the EWA and that of NRW's broader statutory duties and functions is key to determining whether the intended environmental outcomes are being achieved. It would therefore seem timely to consider this as part of the CCEI Committee's priorities for the Sixth Senedd, alongside the reviews announced by the Minister.

Environmental governance post Brexit – interim and longer term arrangements

The letter outlining the Minister's priorities makes minor reference to the interim environmental governance arrangements and ongoing work with stakeholders to develop permanent arrangements. There are a number of matters relating to environmental governance and principles that require the Committee's consideration.

An environmental governance and principles bill

The previous Welsh Government had [committed](#) to “take the first proper legislative opportunity to enshrine environmental principles into law and close the governance gap” back in 2018, with First Minister Mark Drakeford stating that the Welsh Government “*will also bring forward an environmental principles legislation during the next Assembly term, if we're in a position to do so*” in the [legislative statement](#) on the 15th of July 2020. The intention was to bring forward an environmental governance and principles bill in the Sixth Senedd, with the previous Minister Lesley Griffiths MS committing in November 2020, to continuing to work with the stakeholder task group with the aim of bringing forward a White paper on the permanent (statutory) arrangements after the Senedd election in May. It was also [stated](#) at the time that further steps may be taken to strengthen the interim arrangements, alongside the development of a shadow body ahead of the legislation being laid and establishment of the new body in law.

In evidence sessions on the Environment Bill LCM at the [Legislation, Justice and Constitution Committee on the 12th of July 2021](#) and the Climate Change Environment and Infrastructure Committee on the 15th of July, the Minister for Climate Change Julie James MS clarified a number of points in relation to proposals for an environmental governance and principles bill for Wales, and the existing non statutory interim arrangements introduced on the 1st of January this year.

During the CCEI Committee 150721 the Minister confirmed that “the environment principles and governance Bill isn't in the year 1 programme” and that the Welsh Government was working towards a bill “hopefully in year 2” but that she was “not in a position to promise” that it would be included in year 2. The Minister explained that she had to “negotiate with Government colleagues” and go through the “normal Government process for putting forward Bills from your portfolio” but that there was “only so much space in the legislative programme”.

There appears to be a shift in priority given to bringing forward legislation necessary to establish environmental governance arrangements and principles in Wales post Brexit, in contrast to previous commitments made. This is of major concern to WEL members. Wales is well behind the other UK countries in the establishment of domestic measures to address the governance gap, resulting in weakened environmental protection in spite of the recognised nature and climate emergency.

We note that the Minister spoke of the environmental principles and governance Bill as a potential vehicle for nature recovery targets – we welcome and support this, as set out in more detail below. We would emphasise that delay beyond the second year of the Senedd is not acceptable, and that there is no reason that a framework for statutory targets cannot be developed in line with this timetable.

Environmental Principles – Interim approach

In the absence of legislation, the Welsh Government is currently developing non statutory guidance on the application of environmental principles. This guidance is not subject to public consultation and the timetable for its introduction is unclear.

The EU-UK Trade and Cooperation Agreement (TCA) and environmental governance

The EU-UK Trade and Cooperation Agreement (TCA) contains sector specific environment and climate change commitments as well as a number of provisions intended to maintain high environmental standards. Whilst this is the responsibility of the UK Government, the absence of environmental governance arrangements in Wales is notable and requires consideration.

Interim governance arrangements and the role of the Interim Environmental Protection Assessor Wales (IEPAW)

In the absence of legislation, non statutory interim environmental governance arrangements were phased in from the 1st of January this year. Initially this included a web page, followed by the appointment of the Interim Environmental Protection Assessor Wales in March. The interim arrangements are intended for up to two years “during which time the Welsh Government will develop a permanent environmental governance oversight body, allowing for a period of transition from the interim to the new arrangements”. To meet this timeframe it is essential that a Bill should be brought forward in the second legislative programme.

Whilst we welcome the appointment of the IEPAW, the role of the Assessor as it stands is to consider matters relating to the functioning of environmental law rather than a complaints mechanism for

breaches of environmental law by public bodies. As such the role of IEPAW does not address the governance gap that arose when the UK left the EU at the start of the year.

The role of the Senedd in existing and longer term environmental governance arrangements

As WEL has highlighted [previously](#) the role of the Senedd in the interim and longer term governance arrangements is yet to be considered in detail. Initial discussions between the Trefnydd and Presiding Officer had been scheduled to take place in early 2021. The Chair of the CCERA Committee [wrote](#) to the Presiding Officer in December 2020 asking for clarity on the practical operation of the complaints system and the identifying the need to attach Welsh Parliamentary Commission resources to support emerging Parliamentary procedures. It remains unclear what progress if any has been made in this regard.

Statutory Nature Recovery Targets

Wales Environment Link strongly supports conclusion 26 of the Legacy Report of this Committee's predecessor in the fifth Senedd:

Conclusion 26. This Committee firmly believes that the next Welsh Government should introduce targets to arrest the decline and restore biodiversity. We believe our successor Committee should ensure the Welsh Government prioritises this matter during the first year of the next Senedd term.

The Sixth Senedd has, of course, already expressed its view on this, on 30 June this year, passing a resolution that formally declared a nature emergency and called on the Welsh Government to: "Introduce legally binding requirement to reverse biodiversity loss through statutory targets." This motion was supported by Welsh Government and the Minister has since spoken of her intention to bring forward an environmental governance Bill that could also provide a means to legislate for nature recovery targets, which we strongly welcome.

WEL Members were concerned, however, by the comments made by the Minister to this Committee on 15 July, that suggest that this legislation may not be given a slot even in the second year of this

Senedd. Furthermore, the Minister expressed a concern that developing statutory targets might hold up a governance bill. In our view there is no reason that the legislation for nature recovery targets cannot be produced in good time for a second year bill; and as stated above, further delay to governance legislation is unacceptable.

As set out in [Putting Wales on a Path to Nature Recovery](#), published by RSPB and WWF with the support of WEL in June 2021, the Bill should introduce key high-level duties that would not be time-intensive to bring in: a duty to halt and begin to reverse the loss of biodiversity by 2030 and achieve recovery by 2050; and a duty to set SMART long term and interim targets via secondary legislation, informed by independent expertise and scientific advice, and by the post-2020 CBD framework. These must be supported by a legal requirement on Ministers to ensure that the targets are met.

Putting Wales on a Path to Nature Recovery sets out a comprehensive case for long-term and interim statutory nature targets based on evidence including examples from other areas of policy and from approaches taken internationally. The Westminster Environment Bill will introduce a framework for legally binding biodiversity targets for England.

While there will be a need for alignment between domestic targets and the Post 2020 Global Biodiversity Framework that will be finalised in Spring 2022, there is no reason to wait until a final framework is agreed and published to start setting ambitions for Wales. The direction of travel is already clear, not only from the recent draft published by CBD but also from recent agreements including the [Edinburgh Declaration](#), the [Leaders' Pledge for Nature](#), and the [G7 2030 Nature Compact](#). Wales is [among the most nature-depleted countries in the world](#) and must be prepared to show leadership by acting swiftly on this agenda.

This is a win-win situation. Many of the actions that we need to take to protect and restore wildlife will also serve as nature-based solutions to flooding, soil erosion and water and air pollution and also help capture carbon to reduce net greenhouse gas emissions. The joint IPBES & IPCC report published in June 2021 made clear that neither climate change nor biodiversity loss can be successfully resolved without tackling both together. It also highlighted the potential for narrowly-focused action on climate to be damaging for nature, and vice versa. This underlines the need for nature recovery, as

well as climate, to be taken into account across Government decision making at all scales; statutory nature recovery targets will be key to ensuring this happens.

Climate and Biodiversity Education

The majority of climate related priority areas outlined in the Minister's letter are focussed on infrastructure and technology. Whilst welcome, we would urge that this area also needs to include the engagement and education of the people of Wales. Whilst climate awareness is growing, the skills and knowledge required to provide solutions for the future are currently limited. Outside of the more widely understood areas of car driving and energy efficiency, there is a significant lack of knowledge as to what people can do to tackle climate change through individual and everyday choices. It is evident that Environmental Education is needed for adults, as well as young people and children and we should not assume that there is a broad level of understanding across the population as to what can be done or what needs to be done to take action.

Keep Wales Tidy, through the Eco-Schools Programme, and Size of Wales have been delivering environmental education for a number of years and have recently undertaken a number of successful training programmes with teachers. This training was well received but both charities have highlighted the current lack of understanding of environmental challenges, including climate change, biodiversity loss, pollution and over-consumption. RSPB Cymru's report [Every Child Outdoors Wales](#) outlines an "extinction of experience", a phenomenon where children are having less experiences in nature than ever before in in history, and the impacts that this nature deficit can have on their development. Whilst there is significant support for the need to teach these issues, and pupil led learning is directing educators to engage in these issues, in many cases, there is a gap in the skills, knowledge and confidence to effectively engage learners.

The Future of Food, Farming and Land Use in Wales

In the Minister Julie James' letter to the committee outlining Welsh Government's priorities in relation to climate change, environment and infrastructure, we noted that the letter did not specifically refer to the key role that the food and farming sector needs to play. Importantly, it's worth recognising that our food system is at risk from a changing climate. It also directly contributes towards climate change, with agriculture contributing around 16% of Wales' total greenhouse gas

emissions. Based on UK data, food manufacture, transport and retail emissions account for another 5.5%. Furthermore, unsustainable land use is one of the key drivers of biodiversity loss, with more than 80% of Wales' land utilised for agriculture. Crucially, our land is our biggest natural defence against climate change and it could be our biggest ally in restoring nature. We therefore believe that this committee has to consider within its priorities the crucial role of food and farming (from farm to fork – production to consumption), and land use.

The Legislative Programme confirmed that the Government plans to bring the Agriculture Bill to the Senedd in this Senedd year. This critical piece of legislation will shape our landscapes, ecosystems and rural communities for many years to come. Ecological resilience, food production and the long-term viability of farming in Wales as interdependent; a healthy environment underpins food production itself. The Agriculture Bill must respond to the triple challenge of delivering high quality sustainable food whilst restoring nature and getting to carbon net zero. The recent IPCC report adds significant context to this ambition and the Government will have to consider the new data and advice contained in the report closely alongside its work on the Bill. With this in mind, joint scrutiny of the Agriculture Bill and proposed Sustainable Farming Scheme by the Climate Change, Environment and Infrastructure Committee with the Economy, Trade and Rural Affairs Committee would be appropriate.

Net zero - Low carbon delivery plan and 2nd carbon budget

We agree with the Minister on the need for the 2020s to be 'the decade of action' if we are to meet net zero by 2050. We also agree of the importance of the second Low Carbon Delivery Plan and carbon budget in working towards this 2050 objective. Given the new commitment to a 2050 net zero target, we want to see a tightening of targets and transparent, timebound pathways towards identifying them, particularly clear detailed pathways for agriculture and land use. We also want to see scope 3 emissions accounted for in carbon budgets. We appreciate that it is a challenging aspect to measure but feel that it is vital for countries to ensure that this element is included if we are to have a realistic chance of meeting targets set in the Paris Agreements. By including scope three in Welsh Government targets, we would also be setting the challenge for other UK and global governments to fully consider all aspects of CO₂e emissions. We are unclear as to whether Welsh Government will set sectoral emission targets in the second low carbon plan, and if they did, what the level of ambition would be and how they would get there. We believe there could have

been more stakeholder engagement and co design of the second Low Carbon Delivery Plan which we believe is due to be launched in COP 26. We would therefore welcome immediate committee scrutiny on the second Low Carbon Delivery Plan and carbon budget.

Many large businesses have already signed up to the UN Race to Zero campaign which includes scope three impacts in measurement so it would be fantastic to see Government also take this approach and lead by example for some of the Welsh businesses who have yet to sign up.

National Parks/ Protected Landscapes

It's notable that there is no mention of National Parks in the Minister's letter to the committee. This is disappointing given that the WG has previously emphasised the role of NPs in mitigating and adapting to climate change in its priorities for designated landscapes (see, for example the [Valued and Resilient policy statement](#)).

In the letter which accompanied the most recent funding settlement for NPAs WG highlights the importance of the next few years as a time to take action on the climate and acknowledges that a lack of capacity is holding back NPAs' ability to undertake various work including biodiversity and climate change mitigation projects. It would be really timely for the Committee to be looking at whether NPAs have the right tools and resources and what needs to change to enable them to do more in this area.

Plastics and The Circular Economy

We welcome the inclusion of plastics and the circular economy in the Deputy Ministers priorities and although we understand the challenges currently faced with the potential implication of the UKIMA, the commitment to ban plastics and introduce a DRS for drinks containers has been long discussed and many consultations have been published, all of which showing broad levels of public support. The lack of action on these basic principles as a first step in the journey to reducing our plastic waste which is having considerable negative impacts on our terrestrial, marine and freshwater environments is frustrating.

With the passage of the Environment Bill UK (as currently proposed), the Welsh Government will receive new powers to tackle certain issues of waste. We fully expect the Welsh Government to make use of these powers and to take action on some of our most persistent issues in this area, by, for example, introducing a levy on single use cups, supporting reduction initiatives for the littering of single use sanitary items and the promotion of reusable alternatives across sectors.

The issue of extending the carrier bag charge to 'bags for life' (and consideration of a ban on single use carrier bags) is also overdue a decision by Welsh Ministers.

The marine environment and spatial planning

Since the Welsh National Marine Plan (WNMP) was developed, ambitions for development (particularly renewables) in Welsh seas have grown significantly. Potential impacts to marine ecosystems from marine developments include wildlife collision, disturbance, man-made noise, habitat loss, and loss of access to preferred foraging areas (displacement).

The marine environment is not currently resilient and a [recent evaluation](#) shows that the status of some species, such as seabirds, is worsening. Marine planning must therefore ensure that marine development ambitions are delivered in a way which does not further hinder the achievement of [Good Environmental Status](#).

The WNMP does not have a spatial component. As Welsh seas become more crowded, we believe the marine planning system must operate at a strategic and spatial level to:

- guide the siting of developments away from the most ecologically sensitive areas;
- assess and minimise the cumulative impacts on habitats and species; and
- provide greater certainty to developers and other sectors.

Sectoral Locational guidance as currently proposed by the Welsh Government is not enough. A statutory spatial plan must look cross-sector, at either a regional or national level, to address cumulative impacts on our marine ecosystems from all marine users is required. A marine

development plan, such as those that are commonplace on land, would be one way to achieve this. Embedding a spatial approach into marine planning could be usefully considered by the committee.

Tackling Climate Change in harmony with nature: Blue Carbon

It is encouraging that the Minister recognises the importance of our blue carbon habitats in sequestering carbon. In order to meet the ambitious target to becoming carbon net-zero by 2050, it is critical we look towards the ocean and its immense carbon storing capabilities. An NRW-commissioned report in 2020 revealed that blue carbon habitat in the Welsh National Marine Plan area presently stores at least 10 years' worth of Wales' carbon emissions. Not only do these habitats act as effective carbon stores, but equally are efficient at absorbing storm energy; thus, acting as a natural flooding solution.

We recommend the Committee explore the development, implementation and funding of a National Blue Carbon Recovery Plan designed to maintain and enhance our invaluable marine blue carbon habitats.

Restoration and protection of Welsh seas

We welcome the Minister's continued commitment to seas that are "*clean, healthy, safe, productive and biologically diverse*" (a commitment made by all four UK nations within the UK Marine Policy Statement, 2011). Given that the Minister does not elaborate on priorities here, we thought it would be useful to set out our priorities for the Committee:

We recommend that the Committee scrutinises the identification, designation and management of the Marine Conservation Zones process in Wales over the next 12 months. The process of identifying sites is already severely delayed in Wales. In addition, this committee should work with the Rural Affairs Committee to consider scrutinising the UK Joint Fisheries Statement and the Fisheries Management Plans once these are made available.

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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Tudalen y pecyn 66

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Rheoli'r amgylchedd morol / Marine environment management
ME02

Ymateb gan Sue Burton - Ardal Cadwraeth Arbennig Forol Sir Benfro /
Evidence from Sue Burton - Pembrokeshire Marine Special Area of Conservation

Evidence paper to help inform the Climate Change, Environment, and Infrastructure Committee's meeting on 9th December 2021.

Submitted by Sue Burton, Pembrokeshire Marine Special Area of Conservation (SAC) Officer. The views expressed here, whilst gained through my experience of policy delivery on the ground, are my own and not on behalf of the Relevant Authorities Group for whom I work. I have worked in marine conservation in Wales for over 20 years.

Blue Carbon potential and developments in Wales

1. I am not an expert or even hugely knowledgeable about blue carbon, but I have attempted to succinctly note some of my understanding and views.
2. It is indisputable (in so much as much research has been done globally and it is now regarded as clear) that seagrass meadows, mangrove forests, and coastal wetlands store vast amounts of carbon, and their preservation and restoration hold great potential to bank carbon in the form of carbon dioxide (CO₂) and keep it out of the atmosphere, thereby helping to mitigate climate change.
3. In the UK, attention has focused on seagrass meadows, intertidal (and subtidal) muds and saltmarsh and increasingly interest is growing in the potential for seaweed such as kelp.
4. With regard to carbon locked away / sequestered every year, it has been estimated (Armstrong et.al., 2021) that Welsh marine habitats sequester at least 26,100 tonnes of carbon (or 0.03 Mt C) every year, with saltmarshes and intertidal flats accounting for a large percentage of this. This represents around 7 % of the amount sequestered by Welsh forests every year (so by around 21,000 hectares of forest).
5. Armstrong et.al. (2021) also indicate that potentially a wide range of marine habitats contribute to carbon sequestration. Their analyses showed that subtidal muds, sands and gravel were found to sequester the greatest amount of carbon, followed by intertidal flats and saltmarshes.
6. It is important to differentiate between carbon storage and carbon sequestration. Carbon storage is what happens in the leaves of trees (or seagrass) – it is short-term. When those leaves fall, their carbon can be released back into the atmosphere. Long term storage (sequestering) is of most benefit to climate impact. Sequestration is in two forms: biomass, and soil/sediment storage. The key thing about seagrass carbon sequestration is that it

releases the carbon again vastly more slowly than rainforest does because ocean sediment decay processes are so much slower. Therefore, seagrass is described as being 35 times *more efficient* than rainforest despite the comparative lack of biomass. Its not just about the plant itself, but its sediment habitat.

7. Seagrass has been touted as being a climate 'hero'. In Wales, Seagrass Ocean Rescue planted around 1.2 million seeds in two phases during 2020 to restore a 2-hectare meadow off Dale in Pembrokeshire. This was the UK's first large-scale seagrass restoration project. Dr Richard Unsworth (Swansea University) reports that "it is now our belief that the seagrass is on a very firm footing for expanding and ultimately developing into a full meadow over the coming years. Where the seagrass is in expanding clumps, it often has a canopy height of up to 60cm which is great. Invertebrate life is beginning to settle amongst the plants, and fish appear to actively use it". Contribution to fighting climate change was one of the objectives for this effort, but alongside being a demonstrator of carbon sequestration, it was the biodiversity and ecosystem function enhancement that were key drivers for the [project](#). The carbon sequestration potential of seagrass could incentivise its restoration, but this must be considered in addition to other co-benefits and ecosystem services provided by seagrass ecosystems.
8. [Oreska et.al \(2020\)](#) measured parameters for a seagrass meadow in Virginia, U.S.A., part of the largest, most cost-effective meadow restoration to date, to provide the first seagrass offset finance test-of-concept and calculated that the meadow now offsets nearly half a metric ton of CO₂ per hectare per year. But data on carbon sequestration rates for UK seagrasses are still lacking (Seagrass Restoration Handbook – Gamble et.al. 2021). Project Seagrass (pers comm.) say that we are still some way off achieving the figures needed for UK seagrass-generated carbon credits to be traded on carbon markets.
9. ABPmer (2021) detail the Blue Carbon value of carrying out intertidal wetland (saltmarsh) restoration though the managed realignment of coastal defences.
10. Interest in kelp may help seaweed producers attract financial backing to farm kelp for food or alginates, but the potential 'greenwashing' by overselling blue carbon benefits can detract from the genuine benefits that such enterprises can bring (e.g. reducing demand on wild stocks, local jobs...). Aquaculture is a potential growth industry in Wales, and we should take care to ensure that benefits to and impacts upon the natural environment are not overlooked in the blue carbon 'rush'.
11. Everyone wants to 'do blue carbon' no one wants to measure carbon!
12. The level of interest in, and advocacy for, blue carbon is huge. There are now many organisations and research institutions exploring this issue. They are seeking to better understand how the protection and creation of habitats (nature-based solutions) can play a more significant role in contributing to Nationally Determined Contributions (NDCs) for mitigating climate change under the 2015 Paris Agreement.
13. Blue carbon potential should not be all about new restoration, but also protection of what we already have. For example, loss or deterioration of seagrass beds not only leads to the loss of their carbon sink capacity but could also potentially release the carbon already sequestered in their sediments.

14. Armstrong et.al. (2021) state that whilst there is limited evidence on how human activities may disrupt carbon sequestration, protecting marine habitats from damaging activities is likely to be important. Studies such as Luisetti et al. (2019) for example have proposed that the cessation of bottom trawling would promote improved carbon storage in subtidal sedimentary habitats.
15. Blue carbon is being used as a major incentive for Marine Protected Area (MPA) protection/restoration. This is a concern as many claims for carbon capture and figures for “offsetting” are currently unsupportable (although there are networks that are working on improving this).
16. Using blue carbon potential as a driver for MPA management is a suspect tactic as figures are currently so unsubstantiated. However, using the blue carbon ‘carrot’ in addition to the solid biodiversity and ecosystem function benefits of better protected MPAs can perhaps be useful if it attracts badly needed support and resource for MPA management. But personally, I find the constant distraction from the core need of MPAs to address the decline in biodiversity saddening. Why is supporting marine protection, conservation and restoration for the sake of nature and its associated ecosystem benefits to the planet and us (at face value) not enough? The human economic desire to measure everything’s worth before it can be regarded as valuable has delayed progress and stalled marine conservation efforts for decades. This is why we now find ourselves facing a biodiversity emergency as well as a climate one.

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Marine Protected Area (MPA) Management

17. I input to the original Marine Protected Area (MPA) inquiry by the Climate Change, Environment, and Infrastructure Committee (CCERA) in 2017 on behalf of the Relevant Authorities Group (RAG) for the Pembrokeshire Marine Special Area of Conservation (SAC). CCERA members conducted a very thorough inquiry, and I was impressed at the comprehensiveness of understanding shown for the complex issues involved.

18. The final report and recommendations in “Turning the tide? Report of the inquiry into the Welsh Government’s approach to Marine Protected Area management” (August 2017) was an excellent summary of what needed to be done to improve MPA management in Wales.
19. I also input to the follow-up in 2019 with a letter on behalf of the RAG (April 2019 - the content is still all valid) and provided oral evidence in the Senedd in June 2019. CCERA then published its report “Welsh Government’s progress on Marine Protected Area management” (November 2019).
20. As with the original report in 2017, the 2019 follow-up report showed a clear understanding of the issues and made some useful recommendations. I will comment on (some of) these individually below. It was even stronger than the 2017 report and very welcome as it helped to raise the profile of and provide momentum to MPA management discussions (as indeed is CCERA’s current short piece of work on marine environment management).
21. In January 2020, Welsh Government provided a written response to the 2019 follow-up report and its recommendations. This was not sent out to or raised with the Welsh MPA Management Steering Group (MSG) and it was April 2020 before I and some members of the MSG were made aware of it.
22. My dismay at not being aware of Welsh Government’s response was compounded further upon reading it. I will comment as relevant within the discussion on the recommendations below.
23. [Recommendation 1 \(MPA strategy\)](#) – Whilst the production of the Framework and Action plan by the MPA MSG has marked progress, there is a distinct lack of ambition and vision for what is needed and wanted with respect to management of the marine environment. The current MPAs and their management do not meet the needs of the people of Wales for a healthy and productive and well-managed environment. There is a need to increase understanding of the marine environment, what it contains, and our reliance upon it for multiple purposes. The documentation produced to date is process-driven and dry (noted that the target audience is marine managers) and because of that it is hard to follow, much less be enthused by. Perhaps the lack of a strategy is due to Welsh Government not wanting to raise expectations (or invite further pressure) due to its failure to look after what we have already? Failure to adequately manage the marine environment is a global one, so Welsh Government should not feel alone here, but their ambition in areas such as well-being of future generations and sustainability does more to highlight their shortfall towards improving biodiversity. A strategy would aid wider stakeholder engagement. It is possible to frame things whilst managing expectations.
24. [Recommendation 2 \(MPA Management Steering Group wider reach\)](#) – The Wales MPA MSG is effectively a Wales-wide Relevant Authority Group and I can understand why Welsh Government need to limit membership, not least because of size. The WMAAG provides opportunity for greater input and the MSG have since 2020-21 invited non-MSG members to submit applications for their annual action plan funding round. But, to connect to recommendation 1, greater understanding of the importance of well-managed MPAs would

aid input to the MSG and benefit MPA management as a whole. To quote David Attenborough “No one will protect what they don’t care about”.

25. [Recommendation 3 \(IFCA potential\)](#) – For the sake of brevity all I will say here is that I feel that we are disadvantaged in Wales in not having IFCAs. I acknowledge that BREXIT has completely overshadowed fisheries management abilities, but even fishermen I know bemoan the loss of the sea fisheries committees and want improvements to management. As with an MPA strategy, why can’t we look at what we need, and look for ways to work towards it rather than unquestioningly settle for what we have?

26. [Recommendation 4 \(funding an area-based approach\)](#) – As a site-based MPA Officer, I was obviously extremely disappointed to see that Welsh Government outright rejected this recommendation. I know through discussion with multiple MSG members that they would welcome readdressing this. There appears to have been some “historical revision” going on regarding this issue and the decisions recalled from 2015/16. I would like to bring some clarity. The funding breakdown suggestion presented by Welsh Government in 2015/2016 was rejected by MSG members because it was inequitable and not proportionate to management authority jurisdiction (I provided this marked “confidential – sensitive” by Welsh Government within my input in 2019). No alternative break down was suggested as NRW and Welsh Government were of the opinion at the time that they could not fund the MPA network as discussed and there was unfortunately no room for negotiation on the issue. This was an attempt to get relevant authorities to pay more and for NRW to hugely reduce their costs and just pay the same as for example a single local authority (grossly unfair given NRW’s size and jurisdiction). Welsh Government pointed out that they effectively contribute via NRW and local authority revenue streams. In my opinion it seems that following presentation of an unsuitable funding model, and with no further determined investigation into alternatives, further pursuit of funding for the MPA existing (or enhanced) network was shelved which allowed the MSG to focus on strategic work. From the MPA MSG minutes, 27th January 2016: “It was noted that a full-time post at each of the current seven areas was the preferred option; however, a part-time post would be more practical and affordable. Group members expressed concerns over the enlargement of areas. It was suggested that when locality was lost, local authorities were less likely to support the areas”. Five years later then it seems reasonable to return to discussing funding an area-based approach to MPA management. It was not the proposal for the seven-area approach that was rejected, but rather the unequitable funding model presented to support it at that time.

27. The insistence towards directing effort/resources towards (only) strategic work (that benefits NRW responsibilities under international agreements such as OSPAR for example) restricts the ability to progress much-needed local management and compromises site-level management momentum. Feasibility studies and ‘pilots’ that can be applicable across the network (which are permitted within the MSG action plan funding) cannot always cover local management action needs.

28. There has been much concern from RAGs following NRW’s adjustment of core funding to project funding. Further pursuit of NRW funding for RAG work has been halted due to NRW’s assertion that there is no appropriate funding mechanism under which to do so. It is essential

to RAG future functioning that NRW contribute financially to the partnerships. If other managing authorities see that the statutory conservation agency is not paying in, then they will be (justifiably) far less inclined to continue to do so. I'd also like to point out the vast practical difference between guaranteed core funding you can plan on, and competitive grant funding you can't predict, and which is not suitable for ongoing pro-active management work.

29. Feature condition across sites appears to have declined further since input to the MPA Inquiry in 2017. This makes funding of effective MPA management even more imperative. It is extremely difficult to link work/effort to positive changes in feature condition (I know as we were tasked to do that some years ago and justify all the work we had been doing to NRW). Whilst there have been some useful pieces of work, there is very little that has actually been delivered nationally that has made a demonstratable local positive difference to site condition.
30. Actions emerging from the national level to address strategic pressures often need to be taken on a local level, implemented by officers working locally and capitalising on local relationships and support. Partnership working is valued by NRW. Nature Partnerships across Wales have Welsh Government support – why not marine nature partnerships?
31. In Welsh Government's response in January 2020, it was stated that "The nature and the spatial scale of the MPA network in Welsh waters has changed significantly from when there were large spatially discrete sites, such as the five marine Special Areas of Conservation (SACs), to the current complex matrix of 139 offshore and inshore sites." This is distracting and simply not as significant as made out as the vast majority of MPAs (including multiple intertidal SSSIs) sit within the boundaries of the five main marine SACs touching the coast. There does need to be greater joining-up between management of offshore sites however and cross-border sites are complex.
32. [Recommendation 5 \(integrated working with RAGs\)](#) – Although Welsh Government have accepted this recommendation, progress has yet to be made on it. No doubt this has been overshadowed by BREXIT closely followed by the Covid-19 pandemic.
33. I have run out of time and space to write further on the remaining 10 recommendations, but as above no doubt BREXIT and Covid-19 are largely a reason for delays in progress, although some work (e.g. the Assessing Welsh Fishing Activity project) really should have been progressing and reporting before then. I was hopeful that the area statement work by NRW (notably here the Marine Area Statement) would provide some impetus for action. The value they will hopefully add will be created by partners working locally.
34. Fundamentally in the marine environment a multi-sectoral approach is needed and experience to date shows that acting on these responsibilities jointly is the only logical route to successful management implementation. I am grateful but also frustrated to be in the position where I can aid this. I look forward to the opportunity to provide oral evidence to the CCERA Committee and hope to be able to expand as needed then.

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Blaenoriaethau ar gyfer y Chweched Senedd / Priorities for the Sixth Senedd
PR 48

Ymateb gan Cronfa Bywyd Gwylt y Byd (WWF) Cymru /
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We are WWF Cymru, and we are fighting to restore and protect Welsh nature, tackling climate change and reduce Wales global impact on nature. We're determined to ensure that people and nature can thrive together, for generations to come.

Committee priorities for the 6th Senedd

- The future of food, farming and land use in Wales
- Wales' global impacts on climate and nature overseas - global responsibility
- Low carbon delivery plan and 2nd carbon budget
- Environmental governance and principles bill
- Welsh Seascapes
- The nature emergency and nature targets
- Innovative funding

The Future of Food, Farming and Land Use in Wales

In the Minister Julie James' letter to the committee outlining Welsh Government's priorities in relation to climate change, environment and infrastructure, we noted that the letter did not specifically refer to the key role that the food and farming sector needs to play. Importantly, it did not acknowledge that our food system is at risk from a changing climate. It also directly contributes towards climate change, with agriculture contributing around 16% of Wales' total

greenhouse gas emissions¹. Based on UK data, food manufacture, transport and retail emissions account for another 5.5%. Furthermore, unsustainable land use is one of the key drivers of biodiversity loss, with more than 80% of Wales' land utilised for agriculture. Crucially, our land is our biggest natural defence against climate change and it could be our biggest ally in restoring nature. We therefore believe that this committee has to consider within its priorities the crucial role of food and farming (from farm to fork – production to consumption), and land use.

The Legislative Programme confirmed that the Government plans to bring the Agriculture Bill to the Senedd in this Senedd year. This critical piece of legislation will shape our landscapes, ecosystems and rural communities for many years to come. WWF Cymru sees ecological resilience, food production and the long-term viability of farming in Wales as interdependent; a healthy environment underpins food production itself. For example, robust, healthy living soils are vital for the medium and long-term viability of Welsh agriculture and our food supply, as well as being crucial for carbon sequestration and biodiversity.

The Agriculture Bill must therefore respond to the triple challenge of delivering high quality sustainable food whilst restoring nature and getting to carbon net zero. The recent IPCC report adds significant context to this ambition and the Government will have to consider the new data and advice contained in the report closely alongside its work on the Bill. **With this in mind, WWF Cymru strongly recommends that the Climate Change, Environment and Infrastructure Committee request joint scrutiny of the Agriculture Bill and proposed Sustainable Farming Scheme, with the Economy, Trade and Rural Affairs Committee.**

The Ministers letter talks about the need to step up investment in resilient ecological networks and transformative change to reverse the loss of biodiversity. We agree, and believe that the Sustainable Farming Scheme will be crucial vehicle for this in incentivising local and strategic landscape scale nature creation/restoration interventions which respond to the nature and climate emergency.

Wales' Global Impacts on climate and nature overseas - Global Responsibility

One of the key factors driving the global climate and nature emergency is deforestation and habitat loss. The International Panel on Climate Change is clear that without our forests, we will fail to limit global warming to 1.5°C. Wales needs to play its part by changing what it buys, consumes and invests in, since these choices can drive unethical practices and environmental degradation overseas.

Ensuring supply chains are fair, ethical and sustainable is important for a number of reasons, including Wales' obligation to establish itself as a Globally Responsible Nation in the Well-being of Future Generations Act for Wales. Wales has a responsibility to consider how its practices impact global habitats, but Wales also has an opportunity to demonstrate global leadership towards driving sustainability across commodity supply chains around the world.

¹ IPCC, 2021: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J. B. R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekçi, R. Yu and B. Zhou (eds.)]. Cambridge University Press. In Press.

More than 50% of global forest loss and land conversion is attributable to the production of agricultural commodities and forestry products demanded by consumers. Precious habitats like the Amazon are being burnt to clear land - rainforests are being destroyed to produce just a handful of commodities. Wales imports significant quantities of agricultural and forest commodities, some of which are driving deforestation and habitat destruction overseas. Whether that is commodities for the production of soymeal for livestock feed in Wales, palm oil used in everyday supermarket items, beef imported into Wales, cocoa used in many Welsh treats and desserts, or even rubber used to produce latex or car tyres.

WWF Cymru, along with RSPB Cymru and Size of Wales have formed a Deforestation Free Nation Partnership. We have commissioned research to provide data, for the first time in Wales, of the quantities of agricultural commodities: cocoa, palm oil, beef, leather, natural rubber and soy, and estimates of the quantities of forest commodities: timber, pulp and paper, that are imported into Wales. The report, to be launched in October this year, provides an analysis of Wales' demand for these agricultural and forest commodities that are driving deforestation and habitat conversion in the countries in which they are produced, contributing to biodiversity loss, greenhouse gas emissions and social issues.

The research confirms that an area equivalent to 40% of the size of Wales (823,000 hectares) was required overseas to grow Welsh imports of cocoa, palm oil, beef, leather, natural rubber, soy, timber, pulp and paper in an average year between 2011-2018. Crucially, 30% of the land used to grow Welsh imports of commodities is in countries categorised high or very high risk for social and deforestation issues. This means commodity supply chains supplying Wales in these countries risk deforestation, conversion of natural ecosystems and/or social issues, such as child or forced labour. The GHG emissions associated with the conversion of natural ecosystems and changes in land cover for the production of Welsh imports of soy, cocoa, palm and natural rubber total 1.5 million tonnes CO₂ each year. This is equivalent to 4% of Wales' total estimated domestic and imported goods carbon footprint, or 22% of the GHG emissions from transport in Wales. However, this overseas impact is not accounted for in Welsh carbon budgets. There is a need for Scope 3 emissions to be accounted for i.e. emissions across the 'cradle-to-grave' supply chain of the product – from the extraction, production and transportation of raw materials, to the finished product's transportation to the customer, its use and its disposal.

The research is clear – if we are serious about tackling climate change and nature loss in Wales, we have to also address our overseas impacts. We would welcome committee scrutiny in relation to Wales and global responsibility.

Low carbon delivery plan and 2nd carbon budget

We agree with the Minister on the need for the 2020s to be 'the decade of action' if we are to meet net zero by 2050. We also agree of the importance of the second Low Carbon Delivery Plan and carbon budget in working towards this 2050 objective. Given the new commitment to a 2050 net zero target, we want to see a tightening of targets and transparent, timebound pathways towards identifying them, particularly clear detailed pathways for agriculture and land use, as well as blue carbon (carbon captured by the ocean and coastal ecosystems through e.g. seagrass). We also want to see scope 3 emissions accounted for in carbon budgets. We are unclear as to whether Welsh Government will set sectoral emission targets in the second low carbon plan, and if they did, what the level of ambition would be and how

they would get there. We believe there could have been more stakeholder engagement and co design of the second Low Carbon Delivery Plan which we believe is due to be launched in COP 26. We would therefore welcome immediate committee scrutiny on the second Low Carbon Delivery Plan and carbon budget.

Environmental governance and principles bill

There needs to be a shift in priority to bringing forward the environmental governance and principles bill as it is crucial in establishing environmental governance arrangements and principles in Wales post Brexit. We were disappointed that this legislation was not included in the Welsh Government's legislative programme for the first year of this Senedd. While we welcome the appointment of the Interim Environmental Protection Assessor, we would stress that this appointment does not bridge the governance gap which arose on the UK's departure from the EU at the start of this year. It therefore does not diminish the urgency of legislating for the robust long-term arrangements needed to do so, as has been done or is near completion in all of the other UK countries. We would like scrutiny of this work to be prioritised, and allocated sufficient government resource now, to ensure that a bill can be laid early in the second year of the Senedd. We would stress our support for the next, urgent phase of development of policy and legislation to establish an independent environmental governance oversight body; enshrine a high level objective and core environmental principles to fill gaps left by EU withdrawal; and create a framework for statutory nature recovery targets.

Welsh Seascapes

Julie stated in her letter to the committee "Our vision for our seas is that they are clean, healthy, safe, productive, and biologically diverse. Wales has important marine habitats, such as seagrass forests and saltmarshes. Our approach is structured around assessment, protection and management, and restoration. Effective marine planning for, and regulation of, new development is crucial to enabling sustainable marine sector growth, particularly for the development of marine energy projects to contribute to net zero".

There is a need for this committee to scrutinise Welsh Government plans in relation to Wales' marine environment. In the Programme for Government there is a particular commitment to develop a scheme to restore seagrass and saltmarsh. Committee scrutiny should focus on how they intend to develop the scheme and how much money they are resourcing it with. We believe the Welsh Government should be leading and co-ordinating coastal habitat restoration efforts, with incorporation of seagrass restoration & expansion, and ambition to develop seaweed opportunities for example as agricultural feed and food products.

The nature emergency and nature targets

This is a crucial period for biodiversity at a global level, with the Convention on Biological Diversity likely to take place next year in China having been postponed this year. The hope is that this conference will achieve for biodiversity what can hopefully be achieved for the climate at COP26 in Glasgow. If the Welsh Government is serious about addressing the nature crisis in Wales it will need to continue to show leadership, to support ambitious global targets to restore biodiversity and to commit to embedding targets in domestic law. This will provide crucial accountability and focus Welsh Government's attention on achieving the targets and milestones, in the same way we have seen happen on climate. Along with RSPB and WEL

we jointly published a report titled *Putting Wales on a Path to Nature Recovery* in June which we would like the committee to consider. Many of the actions that we need to take to protect threatened wildlife will also serve as nature-based solutions to flooding, soil erosion and water and air pollution and also help capture carbon to reduce net greenhouse gas emissions. We need to adopt a nature positive approach, recognising the value of nature, placing it on the path to recovery and transforming our world to one where people, economies and nature thrive.

In the absence of clear and binding targets, we have not seen joined up action at the scale that is needed. We simply can't wait for years to the Welsh Government to set, and then implement nature targets. Targets are needed now. It is vital for this Committee to take up the agenda left by its processor and give a clear lead on this issue, so that that tackling the climate and nature emergencies should be embedded into all the Welsh Government's key decisions. We therefore urge the Committee to consider this issue as the earliest opportunity.

Innovative funding

Government funding is insufficient to deliver nature restoration at the scale and pace that nature requires. WWF Cymru urges Government to embrace innovative funding mechanisms (such as Bonds) to leverage additional capital into to transition to regenerative farming and wider environmental outcomes. We support the delivery of transformational, systemic nature-based policy solutions that both sequester carbon and restore biodiversity.

I gael mwy o wybodaeth, cysylltwch â / For more information, please contact:

Emily Durrant, ffôn/phone: 029 2053 8517, e-bost/email: edurrant@wwf.org.uk

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Rheoli'r amgylchedd morol / Marine environment management
ME03

Ymateb gan Dr Richard Unsworth, Athro Cyswllt mewn Bioleg Forol - Prifysgol
Abertawe, a Chyfarwyddwr - Project Seagrass /

Evidence from Dr Richard Unsworth, Associate Professor of Marine Biology, Swansea
University and Director - Project Seagrass

Evidence paper: Blue Carbon potential and developments in Wales

Evidence paper to help inform the Welsh Government Climate
Change, Environment, and Infrastructure Committee's meeting
on 9th December 2021.

Submitted by Dr Richard Unsworth, Associate Professor of Marine Biology at Swansea
University and Director of the Wales based global marine conservation charity Project
Seagrass. The views expressed here, whilst gained through my experience whilst working
for Swansea University are my own and not on behalf of Swansea University, however they
do also reflect the views of Project Seagrass.

Background

- Seagrass meadows are subtidal (underwater) and intertidal (beach) habitats comprised of plants adapted to life in the ocean. These sensitive plants and the meadows they create provide many important functions supporting coastal livelihoods. They support fisheries through provision of fish nursery areas, they enhance biodiversity, they protect our coastlines, and importantly they store and lock up carbon into marine sediments.
- Blue carbon is simply the term for carbon captured by the world's ocean and coastal ecosystems and therefore in Wales, habitats such as Seagrass Meadows, Salt Marshes and Kelp Forests are considered blue carbon habitats.
- I am a member of the UK Blue Carbon working group, have published academic articles about Blue Carbon, and I am an accepted authority on the biology and ecology of seagrass meadows and their conservation and restoration. This includes publication of over 100 academic articles on the subject from studies in the UK and globally. I led the UK's first seagrass restoration project based in Dale (Pembrokeshire) that is now showing signs of success.
- There is good evidence globally and in the UK that organic carbon can be stored in high quantities within so called Blue Carbon habitats. Healthy seagrass meadows will lock up vast amounts of carbon each year. But this storage is context specific not habitat specific. For example, value in seagrass or salt marsh vary significantly

between sites and may depend on the anthropogenic, biological, physical and environmental conditions.

- Many Blue Carbon summary reports have been written about the potential of these resources to contribute to the UK and to the Welsh commitments to achieving net zero and becoming included into future Nationally determined Contributions (NDCs). Although these reports are well constructed, the very data that underpins them is largely insufficient. We have some data on Blue Carbon storage and sequestration in Wales but data is grossly inadequate.
- The coverage of seagrass in Wales is likely a fragment of its historic extent. Scant records provide some evidence of this but two factors are important to consider:
 - Wales has decimated its coastline and arguably removed vast areas that would have once been carpeted with Blue Carbon habitats. As the worlds first industrialised nation we ripped apart our coastal bays, estuaries, inlets and sheltered waters to build ports, harbours, processing plants, and create towns and cities for industry workers.
 - As part of this industrialisation we also led the world in metal mining, an industry that developed over thousands of years. The real impacts of this mining activity will never truly be known, but we do know that still to this day metals still flow and contaminate catchments throughout Wales. These heavy metals are well established to be toxic to seagrass.
- Seagrass in Wales in some locations has expanded in coverage in the last decade, however noticeable declines in seagrass condition and area have occurred and still are occurring with limited action to halt or reverse the loss. A major seagrass meadow disappeared close to Llanrhidian marshes in the Burry Inlet with limited consideration from NRW for the causation other than to indicate that “the site wasn’t suitable for seagrass”. An extensive seagrass meadow at Littlewick in the Milford Haven Waterway has declined over the last 30 years due to poor water quality with limited consideration of measures to remedy the problem.
- Restoration of seagrasses and other marine habitats create a huge opportunity for contributing towards carbon capture and brings with it huge potential co-benefits, such as enhanced biodiversity, fisheries support and coastal protection. High resolution modelling of potential seagrass restoration sites in Wales highlights extensive potential opportunities.
- Wales is leading the way in UK (and European) seagrass restoration for the following reasons:
 - Has led research on seagrass restoration for over a decade, including the UKs first major seagrass restoration project.
 - Has an internationally leading group of experts at Swansea University on the ecology, conservation and restoration of seagrass.
 - Is the birthplace and home to the worlds only dedicated globally facing seagrass conservation charity Project Seagrass.
 - Is home to an exciting project to create one of the worlds first seagrass restoration nurseries in Pendine (Carmarthenshire).
 - Is leading the way in creating international networks with interdisciplinary experts in the field.

Actions required for seagrass and Blue Carbon in Wales

Legal responsibilities and instruments

- Land ownership around our coasts within the intertidal and subtidal area creates a barrier to undertake research and restoration of marine habitats. There is currently disconnect between the Crown Estate and other statutory regulators. In some locations, complicated networks of private land owners and occupiers can raise unpredictable site-specific barriers to gaining access to and permission to work on the foreshore and seabed.
- The Crown Estate as the principal landowner within our coastal seas is tasked under its duties in the Crown Estate Act 1961 with maintaining and improving the value of crown land. Blue carbon habitats have significant economic value (fisheries, carbon, biodiversity, water filtration, coastal defence). By allowing the degradation of the seabed and its biodiversity, and not supporting their restoration (including profiting from restoration) is contrary to its remit to enhance the value of this land.
- There needs to be an alternative route to securing statutory permissions for undertaking habitat restoration/enhancement that brings together land owner support with Welsh Government agencies in a simple straight forward manner that encourages the restoration of our seabed with Blue Carbon habitats. Staff within NRW are very helpful and supportive of marine habitat restoration but the system of governance for this is inherently unhelpful. The current marine licencing process was designed for managing potentially damaging operations and is a financial and logistical barrier to scaling up efforts.
- Currently the legal protections for seagrass are insufficient and largely meaningless. Stronger enforced measures are required to protect seagrass in all areas.

Scientific needs

- Consideration of marine and coastal habitats for carbon storage should look way beyond just the basics of organic carbon storage and sequestration and consider their whole Greenhouse Gas Balance. There is considerable potential that where habitats are in a degraded and stressed state that they become net emitters of greenhouse gases through methane and nitrous oxide emissions. Those habitats in lower salinity waters are likely more susceptible to such release.
- Creation of scientific networks to enhance understanding and develop improved action in support of Blue Carbon as a nature-based solution to climate change.
- The Welsh Government needs to make better use of its Universities to answer targeted research questions and pursue avenues of work congruent to improving the state of our coastal seas through a longer term vision.

Conservation opportunities

- Blue Carbon habitats are threatened by a range of factors, some of which are small scale and are 'low hanging fruit' in the context of marine conservation. Bottom trawling in SACs (e.g. Pembrokeshire Marine SAC) remains a threat to seagrass.
- Intertidal tractor use remains a threat to seagrass in some locations where it is acceptable to drive over seagrass.
- Boat anchoring remains a problem in seagrass in some areas. Increased investment in visitor moorings using Advanced Mooring Systems would reduce this activity.

- Providing fishermen with incentives (in the same manner as how farmers are paid to improve biodiversity) to support Blue Carbon conservation and restoration would create ready teams of marine conservation allies and wardens.
- Improved communication about where seagrass is and its importance will help reduce impacts.
- Some locations containing extensive seagrass slip between the gaps of conservation management. The Inland Sea (Holyhead) is such an example where it is largely unmanaged yet highly threatened by poor water quality.
- Wales could create a strategy to bring in external Blue carbon funding/investment as a means to revitalise its coastal environment and create so called 'Green Jobs'. This requires cross government initiatives aimed at solving bottlenecks.
- Restoration and conservation of our coastal habitats requires bigger joined up thinking across multiple stakeholders to create catchment based 'ridge to reef' type projects that improve coastal habitat connectivity.

Complex problems that need fixing and require urgent action

- Many seagrass meadows in Wales are in a poor state due to water quality. The biggest threat to coastal waters is eutrophication from excess nutrients flowing into places such as Milford haven waterway. **This is slowly killing existing seagrass.**
- The growth of poorly managed intensive farming in Wales is exacerbating problems of eutrophication and its impact on the coastal environment.
- Restoration efforts will fail without investment and action to improve coastal water quality. Nutrients and pollutants from agricultural runoff and inefficient sewage systems will limit the potential for marine vegetated habitats to recover regardless of restoration efforts.

Julie James AS

Y Gweinidog Newid Hinsawdd

22 Tachwedd 2021

Annwyl Julie,

Adolygu Ffyniant i bawb: Cymru sy'n effro i'r hinsawdd – cynllun i Gymru ar gyfer addasu i'r newid yn yr hinsawdd

Yn ein cyfarfod ar 11 Tachwedd, cawsom gyflwyniad gan y Farwnes Brown o Gaergrawnt, Cadeirydd y Pwyllgor Addasu - Pwyllgor Newid Hinsawdd Llywodraeth y DU, ar yr Adroddiad Technegol ar Asesiad Risg Newid Hinsawdd y Pwyllgor a'i Adroddiad Cynghori, a gyhoeddwyd fis Mehefin 2021.

Mae Adroddiad Cynghori Pwyllgor Newid Hinsawdd Llywodraeth y DU yn ddigon i'ch sobreiddio. Mae'n dangos yn glir yr her sy'n wynebu Llywodraeth Cymru i sicrhau bod Cymru yn cael ei diogelu rhag effeithiau gwaethaf y newid yn yr hinsawdd.

Yn ystod ein trafodaeth â'r Farwnes Brown, esboniodd nad yw'r Pwyllgor Addasu, hyd yma, wedi bod yn rhan o'r broses o asesu cynllun Llywodraeth Cymru ar gyfer addasu i'r newid yn yr hinsawdd, sef *Ffyniant i bawb: Cymru sy'n effro i'r hinsawdd* ('y cynllun addasu') a'r cynnydd a wnaed o safbwynt rhoi'r cynllun hwnnw ar waith. Fodd bynnag, dywedodd y byddai'r Pwyllgor Addasu'n agored i ymgymryd â gwaith o'r fath pe bai Llywodraeth Cymru yn gofyn iddo wneud hynny.

Credwn y byddai asesiad annibynnol gan y Pwyllgor Addasu yn cynnig gwaith craffu allanol pwysig na fyddai, fel arall, yn rhan o'r broses adolygu.

- A allwch chi egluro a ydych yn bwriadu cynnwys y Pwyllgor Addasu yn y broses o adolygu'r cynllun addasu presennol ac, os felly, sut a phryd y bydd hynny'n digwydd?

I droi at fater cysylltiedig, yn ôl y Fframwaith Monitro a Gwerthuso sy'n cyd-fynd â'r cynllun addasu, Mae Bwrdd Llywodraethu Portffolio Newid Hinsawdd Llywodraeth Cymru (y Bwrdd Llywodraethu) yn cwrdd yn rheolaidd i drafod cynnydd o safbwynt cyflawni'r ymrwymadau a nodwyd yn cynllun ac yn *Ffyniant i Bawb: Cymru Carbon Isel* (a ddisodlwyd gan *Cymru Sero Net Cyllideb Garbon 2 (2021 i 25)*).



Mae'n mynd rhagddo i nodi bod y Bwrdd Llywodraethu, "yn ei dro...yn adrodd wrth **bwyllgor pwnc y Senedd ar y Newid yn yr Hinsawdd** (ychwanegwyd y pwyslais) ac wrth Gabinet Llywodraeth Cymru".

- A allwch chi egluro sut a phryd y gall y Pwyllgor ddisgwyl cael ei adroddiad cynnydd cyntaf gan y Bwrdd Llywodraethu, a pha mor rheolaidd y bydd yn cael adroddiadau wedi hynny?

Yn olaf, nodwn fod Pwyllgor Newid Hinsawdd Llywodraeth y DU wedi ysgrifennu at Lywodraeth Cymru ym mis Mai 2021, i ddweud y byddai'n newid ei arfer mewn perthynas â'i Adroddiad Blynyddol ar Gynnydd drwy'r DU i Senedd y DU. Mae'r llythyr yn awgrymu na allai'r Pwyllgor gynnwys data allyriadau Cymru ar gyfer 2019 yn yr Adroddiad Cynnydd diweddaraf ar gyfer y DU (Mehefin 2021) gan na chawsant eu cyhoeddi mewn da bryd. Mae'n egluro na fydd data allyriadau Cymru, yn y dyfodol, yn cael eu cynnwys yn Adroddiadau Cynnydd y DU oni bai y byddant ar gael mewn pryd i'w dadansoddi. Deallwn fod Pwyllgor Newid Hinsawdd Llywodraeth y DU wedi ysgrifennu llythyr tebyg at y gweinyddiaethau datganoledig eraill hefyd.

- A allwch chi rannu'ch ymateb i Bwyllgor Newid Hinsawdd Llywodraeth y DU â ni, a'i gyhoeddi ar wefan Llywodraeth Cymru?
- A allwch chi egluro goblygiadau hyn yn ymarferol a dweud a ydych chi wedi'ch sicrhau na chaiff hyn unrhyw effaith ar allu'r Senedd i graffu ar gynnydd Llywodraeth Cymru o safbwynt lleihau allyriadau?

Byddwn yn ddiolchgar pe baech yn ymateb i'r uchod cyn gynted â phosibl, ac erbyn 6 Rhagfyr 2021 fan bellaf.

Yn gywir,



Llyr Gruffydd AS,
Cadeirydd y Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

Syr David Henshaw
Cadeirydd
Cyfoeth Naturiol Cymru

22 Tachwedd 2021

Annwyl Syr David,

Gollyngiadau carthion heb eu caniatáu

Mae'r mater o ollyngiadau carthion heb eu caniatáu gan gwmnïau dŵr ar ddwy ochr y ffin wedi bod yn destun dadl wleidyddol a chyhoeddus ddwys yn ystod y misoedd diwethaf.

Rydym yn gwybod fod Asiantaeth yr Amgylchedd ac Ofwat wedi lansio ymchwiliad i weithfeydd trin carthion, yn dilyn cyfaddefiad gan gwmnïau dŵr yn Lloegr y gallent fod yn rhyddhau gollyngiadau carthion heb eu caniatáu i afonydd a chyrsgiau dŵr.

Byddai'n ddefnyddiol pe gallech roi eglurhad ynghylch:

- a yw Cyfoeth Naturiol Cymru ac Ofwat yn bwriadu cynnal ymchwiliad tebyg i weithfeydd trin carthion yng Nghymru?
- os nad oes bwriad i gynnal ymchwiliad o'r fath, pam nad ydych chi'n ystyried bod ymchwiliad yn angenrheidiol.

Byddwn yn ddiolchgar o dderbyn ymateb gennych cyn gynted â phosibl, ac erbyn 6 Rhagfyr 2021 fan bellaf.

Rwy'n anfon copi o'r llythyr hwn at Jonson Cox CBE, Cadeirydd Ofwat.

Yn gywir,



Llyr Gruffydd AS,
Cadeirydd, Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

Eitem 6.3

Mick Antoniw AS/MS
Y Cwnsler Cyffredinol a Gweinidog y Cyfansoddiad
Counsel General and Minister for the Constitution



Llywodraeth Cymru
Welsh Government

Huw Irranca-Davies AS
Cadeirydd
Y Pwyllgor Deddfwriaeth, Cyfiawnder a'r Cyfansoddiad

25 Tachwedd 2021

Annwyl Huw,

Diolch am eich llythyr dyddiedig 15 Tachwedd. Rhoddais yr wybodaeth ddiweddaraf i'r Pwyllgor yn dilyn cyfarfod Gweinidogion y pedair gwlad ar y fframweithiau yn fy llythyr dyddiedig 19 Tachwedd.

Mewn perthynas â'ch pwyntiau penodol:

Yn y cyfarfod rhwng y pedair gwlad ar 10 Tachwedd, cytunwyd ar y materion trawsbynciol sy'n effeithio ar y geiriad ar gyfer y Fframweithiau Cyffredin, sef geiriad y testun ar gyfer Cysylltiadau Rhyngwladol, Protocol Gogledd Iwerddon a'r broses o sut y bydd eithriadau ar gyfer meysydd polisi mewn fframweithiau a effeithiwyd gan Ddeddf Marchnad Fewnol y DU yn cael eu rhoi ar waith. Fel yr eglurais yn fy llythyr dyddiedig 19 Tachwedd, mae Llywodraeth Cymru wedi cytuno ar y testun ar eithriadau Deddf Marchnad Fewnol y DU niweidio'r adolygiad barnwrol parhaus mewn perthynas â Deddf y Farchnad Fewnol.

Yn dilyn y cyfarfod rhwng y pedair gwlad, mae'r fframweithiau'n symud yn gyflym at gael eu cyhoeddi er mwyn i'r pwyllgorau'r deddfwrfeydd graffu arnynt. Mae'r fframwaith Diogelu Iechyd y Cyhoedd a Diogelwch Iechyd eisoes wedi cael ei gyhoeddi, ar 28 Hydref. Mae dogfennau'r fframwaith yn cael eu cwblhau ac mae'r dyddiadau cyhoeddi yn dal yn hyblyg, ond gan ystyried y cafeatau hyn, mae pob ymdrech yn cael ei gwneud i gyhoeddi fframweithiau i graffu arnynt ar y dyddiadau canlynol:

2 Rhagfyr

Diogelwch ac Ansawdd Gwaed; Organau, Meinweoedd a Chelloedd; Cyfraith Cwmniâu (Gweithredaeth Gogledd Iwerddon a Llywodraeth y DU yn unig); Niferoedd Penodol (Gweithredaeth Gogledd Iwerddon a Llywodraeth y DU yn unig).

9-16 Rhagfyr

Y Cynllun Masnachu Allyriadau; Taliad Hwyr; Sylweddau Ymbelydrol; Caffael Cyhoeddus; Cymorth Amaethyddol; Amaethyddiaeth – Rheoliadau Gwrteithiau, Amaethyddiaeth –

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

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Gohebiaeth.Mick.Antoniw@llyw.cymru
Correspondence.Mick.Antoniw@gov.Wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

Tudalen y pecyn 86
We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Ffermio Organig; Amaethyddiaeth – Zootech; Iechyd a Lles Anifeiliaid; Iechyd Planhigion; Amrywogaethau a Hadau Planhigion; Ansawdd Aer; Technegau Gorau Sydd ar Gael (ansawdd aer); Safonau a Labeli Cyfansoddiad Bwyd; Sylweddau sy'n Teneuo'r Osôn a Nwyon wedi'u fflworeiddio; Cemegion a Phlâladdwyr; Adnoddau a Gwastraff.

Ionawr 2022

Pysgodfeydd: Rheoli a Chefnogi.

Mae fy swyddogion wedi bod mewn cysylltiad â chlercod y pwyllgorau am beth amser i drafod y dulliau o ymdrin â'r fframweithiau, ac rwy'n deall bod swyddogion y Senedd yn paratoi i ddadansoddi fframweithiau a'u paratoi er mwyn i'r Pwyllgorau graffu arnynt cyn gynted â'u bod yn cael eu cyhoeddi.

Wrth gwrs, mater i'r pwyllgorau yw hyd y broses graffu ar y fframweithiau. Yn ddelfrydol, bydd y gwaith o graffu ar y fframweithiau a'u cymeradwyo yn digwydd cyn dechrau'r cyfnod cyn-etholiadol yng Ngogledd Iwerddon. Nid yw'r dyddiad hwn wedi'i gadarnhau eto, ond mae'n debygol mai ddiwedd mis Mawrth fydd hynny, os bydd yr etholiadau'n cael eu cynnal ar 5 Mai, yn ôl y bwriad. Rwy'n llawn werthfawrogi bod hyn yn rhoi pwysau sylweddol ar Bwyllgorau sydd eisoes dan bwysau i archwilio nifer fawr iawn o ddeunydd fframweithiau mewn cyfnod byr. Byddai fy nhîm polisi fframweithiau yn hapus i gynnig unrhyw gymorth er mwyn helpu'r broses graffu.

Yn gywir,



Mick Antoniw AS/MS

Y Cwnsler Cyffredinol a Gweinidog y Cyfansoddiad
Counsel General and Minister for the Constitution

Eitem 6.4

Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change

Mick Antoniw AS/MS
Y Cwnsler Cyffredinol a Gweinidog y Cyfansoddiad
Counsel General and Minister for the Constitution



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref MA-JJ-4062-21

Huw Irranca-Davies MS
Chair, Legislation, Justice and Constitution (LJC) Committee

02 Rhagfyr 2021

Annwyl Gadeirydd y Pwyllgor

Diolch am eich llythyr dyddiedig 8 Tachwedd yn amlinellu cwestiynau'r Pwyllgor o'r ddadl ar y Cynnig Cydsyniad Deddfwriaethol sy'n ymwneud â darpariaethau ym Mil Amgylchedd y DU. Rydym yn ysgrifennu i roi mwy o fanylion am y materion a amlygwyd.

Yn gyntaf, hoffem egluro'r sylwadau ynghylch y Bil plastigau untro (SUP), yng nghyd-destun Deddf Marchnad Fewnol y Deyrnas Unedig 2020 (UKIMA). Fel y gwyddoch, cyflwynwyd UKIMA yn dilyn ein hymgyngoriad yn cynnig gwaharddiad ar nifer o eitemau SUP sy'n cael eu taflu'n aml. Er bod yr Egwyddor Cydnabod Cydfuddiannol yn Rhan 1 o UKIMA wedi creu cymhlethdod yn y maes hwn, ein barn gyffredin yw na all UKIMA gwtogi ar gymhwysedd deddfwriaethol y Senedd yn y ffordd y mae'n honni. Mae hyn yn gyson â'r wybodaeth a gyflwynwyd fel rhan o'n her gyfreithiol barhaus ar y mater hwn. Mae'r dystiolaeth a roddwyd i'r Pwyllgor gan y Cwnsler Cyffredinol ym mis Medi a'i lythyr ym mis Hydref yn tynnu sylw at y pwynt hwn. Ar y cyfan, nid ydym yn credu bod UKIMA yn gweithredu er mwyn atal y Senedd rhag deddfu ar faterion datganoledig mewn ffordd sy'n anghyson â'r egwyddor cydnabod cydfuddiannol yn UKIMA. Felly, yng nghyd-destun SUP, nid ydym yn credu bod UKIMA yn gweithredu er mwyn atal y Senedd rhag deddfu i wahardd gwerthu eitemau SUP yng Nghymru mewn ffordd sy'n anghyson â'r egwyddor cydnabod cydfuddiannol yn UKIMA.

Am y rhesymau hyn, nid ydym yn disgwyl unrhyw effaith ar y Rhaglen Ddeddfwriaethol sy'n deillio o UKIMA.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

Tudalen y pecyn 88
We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Fel a amlygwyd yn yr ymgynghoriad Lleihau Plastig Untro, mae Llywodraeth Cymru yn bwriadu gwireddu ein huchelgais ar blastigau untro sy'n cael eu taflu'n aml fesul cam. Rydym yn cymryd pob cam posibl i gyflwyno deddfwriaeth ar gyfer y cam un y gwaharddiadau arfaethedig, cyn gynted â phosibl, o fewn tymor y Senedd hon. Yn y cyfamser, mae swyddogion eisoes wedi dechrau gweithio'n paratoi ar gyfer cyfnodau'r gwaith yn y dyfodol, gan gynnwys adolygu tystiolaeth ar gyfer y 60+ o eitemau ychwanegol a nodwyd yn yr ymgynghoriad fel eitemau ar gyfer gweithredu posibl yn y dyfodol. Yn y Rhaglen Lywodraethu, rydym yn gosod safonau uchel i ni'n hunain ac mae Bil yn un o'r opsiynau yr ydym yn eu harchwilio i gyflawni uchelgais ehangach i fynd i'r afael â'r math hwn o lygredd amgylcheddol.

Diolchwn i'r Pwyllgor am eu hamynedd yn y materion hyn a gofynnwn iddynt nodi bod Bil y DU bellach wedi cael Cydsyniad Brenhinol.

Yn gywir



Julie James MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change



Mick Antoniw MS
Y Cwnsler Cyffredinol a Gweinidog y
Cyfansoddiad
Counsel General and Minister for the
Constitution

Eitem 6.5

Gohebiaeth at y Cadeirydd gan Non Davies ar ran Preswylwyr Moelfre mewn perthynas â pholisïau ynni adnewyddadwy yn nogfen Cymru'r Dyfodol: y cynllun cenedlaethol 2040 gan Lywodraeth Cymru (Saesneg yn unig) – Tachwedd 2021

e-mail received 23.11.21

Bore da Llyr

We write to you as our regional Senedd Member and specifically in your role as Chair of the Climate Change, Environment & Infrastructure Committee. Despite extensive correspondence in this regard and our meeting of 21 October 2021 we remain extremely concerned about fundamental aspects (as previously detailed and in summary below) of the Future Wales Plan 2040:

- Policy 17 ac 18: - the fact that the HM Treasury Department's Government Guidance on Appraisals and Evaluations (The Green Book), a statutory mandatory requirement which evaluates and quantifies the value of 'natural capital' such as landscape and therefore the value of the loss of landscape, was not applied.
- The absence of evidence presented to date which supports the claim that sufficient compensatory mechanisms were applied thereby negating the need to apply the Green Book.
- The delay in developing promised Guidance to accompany FW Policy 2040, a reasonable expectation when making life changing decisions
- That decision making on these Developments of National Significance can ultimately be determined by one individual's subjective interpretation of the terms 'acceptable' ac 'unacceptable' ('no adverse impact unless there are no less damaging alternative solutions').
- In our opinion all these elements culminate in our claim that The Future Wales Plan 2040 is ultimately flawed and as a result our human rights have been breached; Under Article 6 'right to a fair trial' by limiting our rights and the basis upon which we can object to developments on the basis matters such as of loss of 'natural capital' and the resulting adverse impacts of this including the material loss of value of homes and businesses and personal loss of wellbeing; and under article 8 'right to respect for family and private life' due to the flawed and disproportionate impact of this WG policy.

Further and in light of recent media coverage (Western Mail 20 November 2021) referencing Bute Energy, in order to maintain public confidence, we formally request that the formulation & scrutiny of FW Plan 2040 - along with its emerging adverse consequences across Wales – be reviewed and that this matter be raised at the next

meeting of the Climate Change, Environment & Infrastructure Committee which next meets on 25 November 2021 and thereby tabled for future consideration.

We look forward to a reply,

yours sincerely

Non Davies ar ran Preswylwyr Moelfre

e-mail received 29.11.21

Bore da

oes modd cynnwys y llythyr uchod gyda'r dogfennau eraill a ddanfonwyd ac a dderbyniwyd ar gyfer trafodaeth ar 9 Rhagfyr 2021/ *Please include this letter with the other documents in relation to the same subject submitted to and accepted by the Climate Change Committee for discussion on 9 December 2021:*

- Letter Clive Goodridge
- Letter Residents Safle Moelfre
- Letter Dr Jonathan Dean
- Joint Letter Western Mail (26.11.21) & Daily Post (29.11.21) - in addition as below

Diolch am eich cydweithrediad / thanking you for your co-operation in this matter

Yours sincerely / Yn gywir

Non Davies

Letter Published Western Mail 26 November 2021 & Daily Post 29 November 2021

Future Wales renewable energy policies

When the Welsh Government introduced policies on renewable energy to the final draft of the National Development Framework, now enacted as Future Wales, they did so without subjecting those policies to analysis using the mandatory H M Treasury guidance known as the Green Book. Although an Integrated Sustainability Assessment was performed for the whole of Future Wales, no policy level analysis was performed, and some key features of the Green Book approach missed out.

The Green Book requires effects on the value of "natural capital" to be included - this is the value society gives to less tangible assets such as landscapes, habitats and environments. While never as precise as estimating infrastructure costs or revenue streams, it crucially translates impacts on landscape etc into quantitative terms to

weigh up against more tangible costs and benefits. Environmental assessments are usually qualitative, but often money wins, and descriptions, and landscapes, loose.

Also missing from Future Wales are the renewable energy guidelines on acceptability, promised during the public consultation - essentially the "rules of the game" for both developers and impacted stakeholders. We understand from the minister there is no deadline for these to be produced, although proposals under these policies will be submitted soon.

We strongly believe that the guidelines, including the need to assess the impact on "natural capital" value, should be available before the first application under these policies is submitted in the first half of next year. With the right "rules" then maybe the right decisions will be made, for the right reasons, about such Developments of National Significance like Y Bryn Onshore Windfarm and numerous other wind and solar developments. We believe that the renewable energy policies, and any emerging unintended consequences on communities across Wales, should be reviewed.

Yours sincerely

Non Davies (Safle Moelfre Conwy)

Joseph Jones

Dr Jonathan F Dean

e-mail received 30.11.21

Pnawn da

Oes modd rhoi sicwydd na fydd pryniant gorfodol yn digwydd os gwelwch yn dda - **fy mhwyslais isod**? Rheswm arall pam fod angen systemau tryloyw a chanllawiau cydnabyddiedig wrth benderfynu

33. P.111

34.

35. 4.6.35 The Welsh Government recognises the contribution that smaller and community scale developments will have to our future energy system, however it is not envisaged that they will produce enough renewable energy to meet our needs. We therefore need to plan proactively for larger scale developments which will make a larger contribution to our targets.

36. 4.6.36 The Arup report was commissioned by the Welsh Government in 2018 and used a commonly-used methodology for mapping constraints to identify the most suitable areas for large scale wind and solar. These constraints were

discussed and agreed with stakeholders through four workshops, which occurred in the autumn of 2018, before modelling of the areas commenced. Representations have queried the additional use of residential properties as an additional constraint along with road, railway and river corridors. Arup have undertaken additional modelling which demonstrates that this would rule out much of Wales and is therefore it is unfeasible to do this. **This is particularly so where residential properties could be purchased or form part of an ownership agreement to make a scheme acceptable to nearby residential properties, therefore requiring a smaller or no buffer to be used.**

edrych ymlaen at eich ateb ysgrifenedig yn dilyn y cyfarfod
yn gywir
Non Davies

Gohebiaeth at y Cadeirydd gan Clive Goodridge a Kate Watson mewn perthynas â pholisïau ynni adnewyddadwy yn nogfen Cymru'r Dyfodol: y cynllun cenedlaethol 2040 gan Lywodraeth Cymru (Saesneg yn unig) - 22 Tachwedd 2021

Hi Llyr

Some bullet points I'd very much appreciate if you could include in your discussion at this Thursday's CCEIC meeting please?

1/ Policies 17 & 18 don't safeguard individuals as Human Rights, RVAAs (significant visual impact/unattractive place to live), impact on wildlife etc can be overruled by 'in the greater public interest,' except possibly the MOD.

2/ The advisory guidance notes to accompany policies 17 & 18 still not published so how can proposed developments be decided correctly.

3/ Land value increase vs property values decrease, can the Green Book be used for individual proposals.

4/ London School of Economics previously reported property values falling -12% when calculating for up to 150m turbines onshore, they're now proposing up to 250m turbines & still using 700 metres minimum distance from residential properties, so maybe in excess of -20%.

5/ Homes/lives are threatened, it's not all about money but mandatory buy outs should be offered or compensation for those that can't or don't want to move

6/ RWE in Scotland are proposing to offer payments tied to the property within 40db range for life of operation, even if the owners/occupants have objected to the proposal.

7/ Due to proposed offshore is there still the need for onshore to meet 2030 targets or are they over building to account for possible hydrogen production, if so shouldn't these onshore proposals be near where the hydrogen plants will be.

8/ Public inquiries should be held, especially for areas experiencing their 1st development of this kind.

9/ Re the adverse effect on our 'Wellbeing' due to the stress, anxiety, possible health concerns we now all endure for years, as soon as a proposal is known to us, before even pre application stage & then ongoing. Did WG, & ARUP, factor this into their assessment for those of us living close to the proposed sites?

Regards

Clive Goodridge & Kate Watson

Gohebiaeth at y Cadeirydd gan Dr Dean mewn perthynas â pholisïau ynni adnewyddadwy yn nogfen Cymru'r Dyfodol: y cynllun cenedlaethol 2040 gan Lywodraeth Cymru (Saesneg yn unig) - 22 Tachwedd 2021

A topic perhaps on the Future Wales renewable energy policies (Policy 17 & 18) for the committee.

Treasury Green Book - humour me for a moment ...

I raised this during the NDF consultation, and have since quizzed the minister, but I've not had a particularly satisfactory conclusion. I first looked into the Green Book when fighting more pylons on Ynys Môn some years ago. My understanding is the methods in the Green Book should be applied for the evaluation of public policy. The Treasury have confirmed to me this applies to the Welsh Government, and this has been confirmed by the Senedd. It has not been used at any point in evaluation of the totality of Future Wales, or for individual policies. An Integrated Sustainability Assessment has been performed, but this misses out some aspects included in the Green Book, and has not been applied to individual policies. I have no idea where this leaves the legitimacy of policies 17 & 18 should these be challenged.

The Green Book method is a fairly straightforward cost-benefit analysis allowing the Net Present Value of policies, projects or programmes to be determined (and hence decide between options). It does though require the value of "natural capital" to be included - this is the value society give to less tangible assets such as landscapes, habitats and environments. Obviously such evaluation is never as precise as say estimating build costs or revenue streams, but crucially it translates impacts on landscape etc into cash terms to weigh up against more tangible costs and benefits. Typically environmental assessments are always qualitative, while costs and benefits are quantitative, and in my experience money wins, and "moderately adverse" descriptions loose. This is why including the financial value of natural capital in the cost-benefit analysis levels the playing field for the less tangible assets. But, as I say, none of this has been done.

Guidelines for Policy 17 & 18

During the consultation for the NDF, in the final draft, guidelines were promised to help determine when developments were, or were not, acceptable. These have not yet been produced, although applications for developments under these policies have commenced. I have asked the minister when these promised guidelines would become available, and was told that while the publication of the guidelines remains the aim of the government, there is currently no deadline for publication. This leaves

both developers and impacted stakeholders with no "rules of the game". I believe these guidelines should be drafted sooner rather than later, and the public should be consulted before finalisation. Ideally a draft should be available before the first planning application under these policies is examined.

In producing these guidelines, the valuation of natural capital (as per the Green Book), and changes to it, could be included as part of the decision making criteria in determining if a development should proceed or not. This wouldn't replace the qualitative evaluation necessary in an Environmental Impact Assessment, but would give a very tangible "cash" quantitative assessment of the impacts on less tangible, natural assets. This would help make any decisions on developments far more transparent and help gain buy-in from impacted stakeholders.

Please consider these thoughts for discussion in the committee, or if this is not a suitable topic for discussion, perhaps you could advise me who would be most appropriate to take the idea to.

Cofion
Jonathan

Dr Jonathan F Dean

Gohebiaeth at y Pwyllgor Newid Hinsawdd, yr Amgylchedd, a Seilwaith gan unigolyn ynghylch lleoliad arfaethedig Canolfan Ganser Felindre (Saesneg yn unig) – 28 Tachwedd 2021

I am a supporter of the campaign to co-locate the new Velindre Cancer Centre at the Heath UHW site and not to destroy a large area of valuable green urban space at the Northern Meadows. I believe that both of those issues are within the terms of reference for your committee.

Climate change is such a topical issue now and we have our very own opportunity to act locally. The proposal to build a replacement Velindre Cancer Care Centre on a largely green field site in north Cardiff is not only wrong clinically, but it will seriously affect the environment and climate care aspirations of Wales.

I would be grateful if your committee could spend some time debating whether this project is in the best interests of Wales, and the world, at your meeting next week. Could it please be considered then or proposed as an agenda item for a future meeting?

Over a year ago, 24 out of the 33 Oncology Consultants at Velindre signed up to a letter expressing serious concerns about the proposed clinical model and suggested that the Cancer Care facility should be on the same site as the Acute District General Hospital at the Heath, so that other specialist support services would be immediately to hand. Since then many more senior clinicians have added their support

Lady Brown spoke to your committee recently about adaptations and mitigations to meet the challenges of Climate Change. She highlighted the value of Green Urban Spaces and that point seemed to resonate with members.

At 75 years of age, I am not a NIMBY. I live in the Whitchurch area, but my concern is about the legacy which I will leave for future generations. I am currently researching the possibility of installing Solar PV panels and an air sourced heat pump. I am unlikely to achieve a payback whilst still enjoying my time on this planet. The total cost to the public purse of this project is very considerable and will be borne by future generations - but is this good use of that money?

Thank you in anticipation,