Agenda - Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith

Lleoliad: I gael rhagor o wybodaeth cysylltwch a:

Ystafell Bwyllgora 4 Tŷ Hywel a Marc Wyn Jones fideogynadledd drwy Zoom Clerc y Pwyllgor Dyddiad: Dydd Iau, 8 Mehefin 2023 0300 200 6565

Amser: 09.30 <u>SeneddHinsawdd@senedd.cymru</u>

Rhag-gyfarfod preifat (09.15-09.30)

Cyfarfod cyhoeddus (09.30-12.15)

- 1 Cyflwyniad, ymddiheuriadau, dirprwyon, a datgan buddiannau (09.30)
- 2 Bioamrywiaeth a'r argyfwng natur sesiwn dystiolaeth 1

(09.30-10.45) (Tudalennau 1 - 50)

Dr Jonathan Davies, Uwch Ecolegydd, Adfer Natur, Bannau Brycheiniog – yn cynrychioli'r Tri Awdurdod Parc Cenedlaethol yng Nghymru
Annie Smith, Pennaeth Polisi Natur a Gwaith Achos, y Gymdeithas Frenhinol er Gwarchod Adar (RSPB) Cymru – yn cynrychioli Cyswllt Amgylchedd Cymru Chloe Wenman, Rheolwr Polisi ac Eiriolaeth (Cymru), y Gymdeithas Cadwraeth Forol – yn cynrychioli Cyswllt Amgylchedd Cymru

Dogfennau atodol:

Briff Ymchwil - Bioamrywiaeth

Papur - Dr Jonathan Davies, y Tri Awdurdod Parc Cenedlaethol yng Nghymru (Saesneg yn unig)

Papur - Llwybrau i 2030, Cyswllt Amgylchedd Cymru (Saesneg yn unig)

Papur - Bil sy'n gadarnhaol o ran natur, Cyswllt Amgylchedd Cymru (Saesneg yn unig)



Egwyl (10.45-11.00)

3 Bioamrywiaeth a'r argyfwng natur - sesiwn dystiolaeth 2

(11.00-12.15)

(Tudalennau 51 – 61)

Dr Katie Medcalf, Cyfarwyddwr yr Amgylchedd - Environment Systems

Dr Tim Pagella, Darlithydd mewn Coedwigaeth - Prifysgol Bangor

Dr Richard Unsworth, Athro Cyswllt, Biowyddorau - Prifysgol Abertawe

Dogfennau atodol:

Papur - Dr Katie Medcalf, Environment Systems (Saesneg yn unig)

Papur - Dr Tim Pagella, Prifysgol Bangor (Saesneg yn unig)

4 Papurau i'w nodi

(12.15)

4.1 Bil Diogelu'r Amgylchedd (Cynhyrchion Plastig Untro) (Cymru)

(Tudalennau 62 - 63)

Dogfennau atodol:

Llythyr gan y Cadeirydd at y Gweinidog Newid Hinsawdd mewn perthynas â Bil Diogelu'r Amgylchedd (Cynhyrchion Plastig Untro) (Cymru)

4.2 Dadl yn y Cyfarfod Llawn ar adroddiad blynyddol cyntaf y Pwyllgor ar Gomisiwn Seilwaith Cenedlaethol Cymru—2022-23

(Tudalen 64)

Dogfennau atodol:

Llythyr gan Gymdeithas Yswirwyr Prydain at y Cadeirydd ynghylch y ddadl yn y Cyfarfod Llawn ar adroddiad blynyddol y Pwyllgor ar Gomisiwn Seilwaith Cenedlaethol Cymru—2022-23 (Saesneg yn unig)

4.3 Blaenoriaethau Climate Cymru

(Tudalennau 65 - 70)

Dogfennau atodol:

Llythyr gan Climate Cymru at y Cadeirydd mewn perthynas â meysydd gwaith blaenoriaeth i'r Pwyllgor eu hystyried 4.4 Safle glo brig Ffos-y-Fran

(Tudalennau 71 - 72)

Dogfennau atodol:

Llythyr gan y Rhwydwaith Gweithredu Glo at y Cadeirydd ynghylch gwaith glo brig Ffos-y-Fran (Saesneg yn unig)

4.5 Grŵp Rhyngweinidogol ar Sero Net, Ynni a Newid Hinsawdd

(Tudalen 73)

Dogfennau atodol:

Llythyr gan y Gweinidog Newid Hinsawdd at y Cadeirydd mewn perthynas â chyfarfod y Grŵp Rhyngweinidogol ar Sero Net, Ynni a Newid Hinsawdd

5 Cynnig o dan Reol Sefydlog 17.42(vi) a (ix) i benderfynu gwahardd y cyhoedd o weddill y cyfarfod (12.15)

Cyfarfod preifat (12.15-13.00)

- 6 Bioamrywiaeth a'r argyfwng natur trafod y dystiolaeth a gafwyd o dan eitemau 2 a 3
- 7 Trafod adroddiad drafft y Pwyllgor ar y Memorandwm Cydsyniad Deddfwriaethol Atodol ar y Bil Ffyniant Bro ac Adfywio

(Tudalennau 74 - 77)

Dogfennau atodol:

Adroddiad drafft (Saesneg yn unig)

8 Bil yr Amgylchedd (Ansawdd Aer a Seinweddau) (Cymru) - briff technegol gan swyddogion Llywodraeth Cymru

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Mae cyfyngiadau ar y ddogfen hon

BD01 Dr Jonathan Davies

Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee

Biodiversity and the nature emergency | Bioamrywiaeth a'r argyfwng natur

Ymateb gan Dr Jonathan Davies, Bannau Brycheiniog– ar ran y Tri Awdurdod Parc Cenedlaethol yng Nghymru | Evidence from Dr Jonathan Davies, Bannau Brycheiniog- on behalf of the Three National Park Authorities in Wales'

Enhancing the role of designated Landscapes in implementing the COP15 biodiversity agreement in Wales

Prepared by Jonathan Davies, Bannau Brycheiniog, based on consultation between the 3 NPs.

26/05/2023

The Kunming-Montreal Global Biodiversity Framework (GBF), adopted in December 2022 at the Convention on Biological Diversity's COP15, includes 23 targets designed to address the global biodiversity crisis. The decision includes targets for effective conservation and management of at least 30% of the world's lands, inland waters, coastal areas and oceans, with emphasis on areas of particular importance for biodiversity and ecosystem functioning and services. The GBF prioritizes ecologically-representative, well-connected and equitably-governed systems of protected areas and other effective area-based conservation, recognizing indigenous and traditional territories and practices. The GBF targets restoration (completed or underway) on at least 30% of degraded terrestrial, inland waters, and coastal and marine ecosystems, reducing to near zero the loss of areas of high biodiversity importance, including ecosystems of high ecological integrity, cutting global food waste and reducing by half both excess nutrients and the overall risk posed by pesticides and highly hazardous chemicals.

Designated Landscapes (DLs) can play a significant role in delivery of these targets in Wales. The DLs can demonstrate an existing contribution to some of the Targets, but with appropriate support that contribution can be significantly increased. The recommendations in this paper align with the recommendations from the Welsh Government Biodiversity Deep Dive group of experts, which identified key themes and recommendations for specific actions. Those recommendations included: transforming our protected sites series so that it is better, bigger, and more effectively connected; creating a framework to recognise Nature Recovery Exemplar Areas and Other Effective Area-based Conservation Measures (OECMs) that deliver biodiversity outcomes; unlocking the potential of DLs to deliver more for nature; continuing to reform land and marine management and planning (including spatial) to deliver more for both protected sites and wider land / seascapes; building a strong foundation for future delivery through capacity building, behaviour change, awareness raising and skills development; unlocking private investment to deliver for nature at far greater scale and pace; and developing and adapting monitoring and evidence frameworks to measure progress towards the 30 by 30 target and guide prioritisation of action.

Ear mark funds for leveraging nature recovery in DLs, including SFS and other delivery mechanisms.

Farming, including grazing, uses the largest share of land in most DLs and for the DLs to add value in addressing the biodiversity crisis, the contribution of farming and grazing to nature recovery within those landscapes must be above the national average. This requires higher adoption of biodiversity-friendly measures under the Sustainable farming Scheme than outside the DLs. Welsh Government should consider options for giving farms inside DLs improved access to the Sustainable Farming Scheme, for example by boosting their score for being within a DL.

DLs are ideally situated to identify the highest value options under the SFS for nature recovery and to promote adoption by farmers, through individual and collaborative actions. Welsh Government can learn from the experience of Defra in implementing "Farming in Protected Landscapes" in England and develop a comparable instrument to be made available in advance of the launch of the SFS. The purpose of such an instrument should be two-fold: promoting participation in the SFS and delivering a higher level of nature recovery outcomes on farms that exceeds the ambition of the SFS.

The SFS dwarfs the amount of funding that a Designated Landscape can use: SLSP, NRW's Strategic Allocation Fund, and the Nature Network Fund are not of the same order of magnitude as an agrienvironment scheme. DLs use precious resources in sourcing and administering new forms of grant funding or developing schemes in response to WG-funded and NRW-funded schemes. Public money would be saved by allocating this funding directly to the DLs, who have demonstrated their delivery capacity and expertise. DLs would also benefit from quicker outlining of SMS priorities & options and values.

Identify long term funding mechanisms for projects to be implemented beyond typical 2-3yr windows, including mechanisms for at least 10-year funding for some NR issues

Nature recovery projects depend on the actions and goodwill of landowners and managers, requiring a painstaking process of collaboration, negotiation and mediation. These processes can be played by DLs, but they require stable funding in the long term to build and sustain teams fit for purpose. DL staff may lack the skills and experience and would benefit from traineeships or sponsored education to develop capacities. DLs can play a lead role in building relationships, convening partnerships, fostering collaboration, and enabling actors to implement large scale nature recovery. These roles require dedicated nature recovery units with adequate resources to catalyse action throughout DLs on a meaningful spatial scale.

Strengthen capacity of DLs for attracting private investment for large scale nature recovery Substantial private investment is needed to achieve biodiversity goals and DLs have limited capacity to engage private investors in partnerships for long term impact. Welsh Government should provide DLs with additional capacity and access to technical expertise for private sector engagement and innovation in support of nature recovery. DLs are an ideal location to develop innovative private sector partnerships that aggregate investments into the multiple ecosystem services generated by nature recovery, and that aggregate the supply of those ecosystem services through collaborative action in target landscapes. DLs can also lead the way in developing results-based approaches that promote biodiversity restoration on farms.

Strengthen capacity in DLs for nature recovery planning and implementation.

WG should strengthen human resources and staff capacities to use tools for nature recovery planning, such as the CURVE maps, Resilient Ecological Networks, Landscape Character and Condition Assessment and others. Strategic planning of nature recovery should be made integral to the development of Nature Recovery Exemplar Areas and Other Effective Area-Based Conservation Measures. The use of strategic planning as a tool for mobilising and collaboration with other actors in DLs, including farmers and other agriculture actors, should be strengthened. Improved use of nature recovery planning will complement existing Nature Recovery Action Plans, strengthen collaboration, and will help prioritise scarce resources.

Reduce the bureaucratic process around consenting and funding for nature positive works in, and for active management of, designated sites.

DLs have a core mandate for Nature Recovery and should be given greater freedom and responsibility for implementing appropriate works on designated sites, including marine designated sites. DLs should be adequately resourced to actively manage designated sites in the character for which they were designated. Simplified mechanisms are needed to allow implementation of management actions for which sites were originally designated, such as fast-tracked license application, reduced fees, or waived consents. This could go beyond designated sites to promote the "joined up, and "bigger and better" thinking. It could also include positive actions beyond what a site was designated for (e.g. natural flood management actions).

We are hopeful that the Interim Environmental Protection Assessor's review of designated sites will recommend that Natural Resources Wales establishes long-term consents and assents with 'safe pair of hands organisations' such as DL authorities, freeing up NRW to focus instead on more intractable problems and owner-occupiers. We would hope to develop long-term concordats with organisations such as NRW, National Trust, Dwr Cymru Welsh Water and other relevant NGOs too.

Simplify funding operations within NRW to facilitate their staff to be able to contract works OR to allow trusted partners to deliver on their behalf.

As mentioned above, DLs and NRW have a shared mandate for Nature Recovery, and DLs should be a partner of choice for NRW to enhance delivery of nature recovery.

Monitor progress towards nature recovery in DLs, for example connecting with established initiatives.

Welsh Government and NRW have generated significant environmental data at the national level but monitoring systems do not currently match the needs of the DLs. Furthermore, condition assessments of designated sites are out of date, creating a barrier to achieving favourable conservation status as a contribution towards 30by30. Earth observation data from Living Wales, combined with surveys carried out under Erammp can provide important information about the state and trends of DLs. It is recommended to use these established data sets, and others, to evaluate environmental trends in nature recovery in the DLs, but data must be accessible to DL's in a timely manner. It is further recommended to address gaps in sampling that undermine analysis in the DLs. Established survey points in DLs could provide insights into trends in habitat condition, species populations, and ecosystem functions and services and will be useful to tracking progress up to 2030. Addition of a limited number of new survey points in DLs can strengthen this analysis and give greater confidence in the performance of the DLs in achieving Nature recovery targets. Welsh Government can enable this by mandating the DLs s and other Public Bodies to work on environmental monitoring across the environment and agriculture sectors.

Welsh Government should also support skills development of DLs for survey and monitoring. DLs have access to a growing array of useful datasets, for example the Environmental Change Network sites, county and highways weather stations, river gauging stations, and other 'big data' sources and should be enabled to capture, analyse and transfer the knowledge from these data to understand the changing trends in the DL in response to climate change and nature decline. Further support is recommended for training, mentoring and emergence of future generations of county wildlife recorders and naturalists who form the backbone of nature conservation in Wales and the UK.

Identify and tackle national-level and local-level policy clashes in both terrestrial and marine environments.

At times policies clash and give conflicting direction. Examples include conflicts between local authority grass mowing policies and nature recovery / climate change policies, Important Curlew Area boundaries overlapping with National Development Framework maps for wind farm development, monitoring of bat fatalities at existing wind turbines to better inform wind energy development decisions, forestry removal off

deep peat, and policies against simple grazing infrastructure despite peat/biodiversity and carbon targets. These clashes also exist in planning, risk management authority policy and highways management. At present those clashes must be negotiated on a case by case and authority by authority basis. Conducting this work nationally would free up resources and help drive rapid and widespread action for nature. Welsh Government should conduct a national policy review to identify clashes and to provide direction on the hierarchy of policies at both national and local level.

Welsh Government is also recommended to review the effectiveness of implementation of key legislation for biodiversity conservation, such as the Town & Country Planning Act (1990), and Environmental Impact Assessment (Agriculture) (Wales) Regs.

Improve cost benefit analysis and evaluate investment pathways related to sustainable land and water management (e.g. flood and drought remediation).

Many of the highest value actions for Nature Recovery generate multiple outcomes, including biodiversity conservation, improved water quality, climate change mitigation, and climate change adaptation, including flood and drought mitigation. Nature recovery generates health and well-being benefits with significant economic benefit (reducing long term health conditions, improved mental health and well-being, and reduction in pressure on healthcare services resources / budgets etc). Improved valuation of these benefits in relation to their cost will provide valuable evidence that can be used to mobilize private investment. With increased public support, including co-convening of investment partnerships, DLs can help to increasing the flow of finance for nature recovery and ecosystem rehabilitation. This is consistent with the concept of Nature based Solutions promoted by the UK government at COP26.

Streamline NRW procurement and licensing processes for working with Land Agents

Simplifying these processes would allow DLs, as the Local Authority, to work more efficiently on their own land. This will allow resources to be utilised more effectively and efficiently on ecosystem and biodiversity restoration at scale.



Pathways to 2030: 10 key areas for investment in nature's recovery across Wales

Addressing the nature emergency - the importance of finance

Wales faces a nature emergency. Degradation of ecosystems has caused the decline of many species, impacted negatively on our economy and wellbeing, and depleted the services which nature provides and on which we all depend. Failure to act urgently could cause irreversible damage to habitats and species, while hampering our response to the challenges of mitigating and adapting to climate change.

Recognising that we are entering the sixth global mass extinction event, and that human safety and wellbeing is threatened by the loss of ecosystem services such as pollination and flood prevention, the Senedd declared a nature emergency in 2021. Noting that Wales is falling behind other UK countries and is failing to meet its international biodiversity commitments, the Senedd called for legally binding nature recovery targets and new domestic environmental governance provisions.

Urgent action for nature recovery is essential to strengthen the natural capital on which people and the economy depend, to address the climate emergency and to deliver international commitments as part of the post 2020 agenda under the Convention on Biological Diversity. The Kunming-Montreal Global Biodiversity Framework, agreed in the 15th Conference of the Parties (COP15) in December 2022, includes a new mission for the period up to 2030 "to take urgent action to halt and reverse biodiversity loss to put nature on a path to recovery for the benefit of people and planet". The need for urgent collective action was recognised through the Welsh Government's Biodiversity Deep Dive, undertaken in the run up to COP15, focusing on one of the central targets – a commitment to protect and effectively manage at least 30% of our land, freshwater and sea for nature by 2030.

Delivering the actions required for nature's recovery requires an increase in public investment in nature. We need to invest more in managing land to maintain and restore habitats, in research and monitoring actions to develop our evidence base, in communications and education to enhance the awareness of stakeholders and the public, in human resources to develop and implement nature policies and programmes, in stronger governance, and in regulatory enforcement.

The failure to halt nature's decline in recent decades is partly a result of insufficient funding for the necessary actions. A recent study for the Green Finance Institute estimated that there is a gap of between £5 billion and £7 billion between the resources currently dedicated to nature recovery actions in Wales and those needed to meet priority outcomes for nature.

Part of the nature financing gap should be met by private investment in natural resources, reflecting businesses' dependencies on nature and responsibilities to support its recovery. This depends on government action to support and regulate the development of nature markets, and to co-invest alongside businesses. Alongside private finance, there is a need for increased public expenditure to help to close the nature finance gap. Many of the benefits of nature are public goods, benefiting the entire population and economy of Wales, and will not be delivered by private finance alone. Public investment in nature will enhance Wales's national infrastructure and deliver multiple benefits, supporting economic development and physical and mental wellbeing, and reducing the costs of public services such as healthcare and flood management.

Tudalen y pecyn 25

This report sets out priority actions for nature recovery to 2030 (**Table 1**) and the public investment required to deliver them. These actions are arranged under 10 themes, ranging from public access to nature to peatland conservation and species protection. Under each theme, we identify priority actions to **STOP** activities that are damaging nature, **REDUCE** adverse effects, and **START** to deliver positive actions for nature recovery. In each area we define the actions needed and the financial resources required to deliver them, both in overall terms and the additional resources needed above existing public expenditures and taking account of overlaps between actions

Tables 2 and **3** present an overall summary of financial needs across the 10 action areas. The total (gross) costs of the actions are summarised in **Table 2**, while the net additional costs of actions (on top of existing expenditures and taking account of overlaps between actions) are summarised in **Table 3**.

The additional annual expenditures needed to deliver the costed package of actions for nature recovery are estimated to amount to £158 million annually, assuming that the majority of the annual agriculture and rural development budget also focuses on actions that contribute to nature recovery.

The costings provided are indicative, and some could be refined as further evidence becomes available, but we believe they provide a reasonable assessment of the scale of financial investment required now to begin to respond to the nature crisis. The list of actions defined, and the financial resources needed to deliver them are not exhaustive, and more will be needed if nature recovery is to be achieved. However, we hope that this document helps to inform debate about priorities and financial resource needs, and how we secure the funding required to meet national needs and international biodiversity commitments.

Table 1: Nature finance actions and costs

1. Access and public participation			
STOP	REDUCE	START	
Reverse the erosion of accessible wildlife rich spaces, especially in urban areas.	Barriers to co-operative environmental action.	Delivering access to environmental justice for the people of Wales.	

Wildlife Rich Green Spaces

Priorities in this area are to:

- 1. Introduce new Green Space Standards and champion high quality, accessible and nature rich green spaces across Wales;
- 2. Invest in provision of high quality and accessible green spaces, especially for the most deprived communities in Wales;
- 3. Increase tree cover to 20% of Wales's urban area.

A new impetus is required to champion green spaces across Wales, develop new Green Space Standards, and work with local authorities and communities to enhance provision, management and access. This could be achieved by establishing a network of green space champions across Wales, to develop a new Green Spaces Programme and Standard and to co-ordinate its implementation at local level. A national green space champion and co-ordinating team would develop guidance and standards for green space and accessibility, and undertake policy advocacy, advisory and communications at national level. 30 local champions (1 per 100,000 population) would champion green spaces locally, working with local authorities, infrastructure managers, local businesses and organisations to enhance access, improve quality of green space, raise awareness of the benefits of access to nature and support designation of Local Nature Reserves. The overall cost would amount to £2.2 million per year, including staff costs of £1.98 million (33 staff + overheads) and an annual communications budget of £200,000.



A substantial programme of investment in the provision of new, high quality and accessible green spaces across Wales is needed, focusing especially on the most deprived urban areas. A 2020 report by Vivid Economics for the National Trust estimated that a £5.5bn capital investment in upgrading and creating urban green spaces across Great Britain would deliver £200bn in physical health and wellbeing benefits to the most disadvantaged communities, as well as benefits for active travel, biodiversity, carbon capture and air quality. The report used a GIS mapping approach to identify areas of under-provision of green space and mapped these against deprivation to prioritise investment needs. The report estimated the need for £5.45bn capital spend and £275m annual operating spend. The report did not provide separate estimates for Wales, but included Cardiff, Newport and Swansea in the analysis. If the investment needs for Wales were proportionate to population, this would suggest a need for capital investment of £278 million and annual operating expenditure of £14 million, at an average annual cost of £39.3 million over 2023-30.

Wales's mean urban canopy cover was estimated at 16.3% in 2013, with 14,097 hectares of a total urban area of 86,331 hectares covered by trees. Achieving an overall target of 20% of urban tree cover by 2030 would provide benefits for human health and wellbeing and enhance ecosystem services in urban areas. It would require planting trees over 3169 hectares. Assuming a typical cost per hectare of £10,800 (based on £8.30 per tree for Local Authority Treescapes Fund in England, and typical planting rate of 1300 trees per hectare), the total cost of reaching a 20% target would be £34.2 million, or an average of £4.3 million per annum between 2023 and 2030. This would need to be targeted in areas with less than 20% tree cover at present.

Co-operative environmental action

A priority is to reduce the barriers to co-operative environmental action by using the Sustainable Farming Scheme (SFS) to facilitate collaboration between landowners to deliver catchment scale Nature Based Solutions and build on the Project Skyline recommendations to empower communities to take control of underutilized publicly owned land/sea for nature restoration.

Collaboration between farmers and land managers has potential to enhance greatly the effectiveness of environmental land management actions, helping to achieve positive change at the landscape scale. This should have benefits for species, habitats and ecosystem services, as well as land managers themselves (helping to enhance cost effectiveness, learning and social interaction and address joint challenges and opportunities).

The collaborative tier of the new SFS will help to address this, and will require sufficient funding, promotion and facilitation.

The Project Skyline report examined the feasibility of landscape-style community land stewardship in the South Wales Valleys as a means of giving communities a connection to landscape that can provide income, jobs, a place of social and cultural activity, and a home for nature. The report recommended that Welsh Government should support the establishment of two or three pilot landscape-scale, community stewardship projects in the Valleys. We suggest that three pilots are established, each running for 2 years, to develop a landscape vision and community plan in three communities. Each pilot will require a project manager and an additional annual budget to cover overheads, expenses, event costs and fees, at an annual cost of £240,000 across the three pilots. A similar annual budget would be required between 2025 and 2030 to implement these plans in each community and/or develop plans for additional communities. More investment would be needed in future years to roll this approach out more widely across Wales.

Environmental Justice for the People of Wales

Wales must create an independent body to oversee the implementation of environmental law, facilitate public access to environmental justice, and uphold environmental standards.

We suggest that, as a minimum, a body similar to <u>Environmental Standards Scotland</u> is required, with <u>similar levels of resourcing</u> - 24 staff and an annual budget of £2.2 million.

Tudalen y pecyn 27



2. Farmland			
STOP	REDUCE	START	
The ongoing loss and degradation of wildlife habitat on farmed land.	Agriculture's environmental impact at home and abroad.	Funding pilots and training programmes on regenerative land management that facilitates nature recovery.	

Regulatory enforcement

There is an urgent need to stop the ongoing loss and degradation of wildlife habitat on farmed land by better targeting of support, monitoring and enforcement of regulatory requirements (including for water and air pollution).

Pollution from agriculture has a major impact on species and habitats, and urgent action is needed to enforce existing regulations more effectively. Natural Resources Wales has stated that it requires between 60 and 200 new staff to ensure compliance with existing legislation. We believe that resourcing should be at the upper end of this range if legislation on water pollution, air pollution and protected sites is to be fully and effectively enforced.

NRW's latest annual review for 2020/21 indicates that the average wage of its staff was £39,170, and that inclusion of other staffing costs (NI and pensions), as well as IT, office and operating costs increases this average to £60,000. This suggests a need for further expenditure of £12 million per year to fully enforce pollution regulations.

Sustainable land management

There is an urgent need to reduce agriculture's environmental impact at home and abroad by transitioning Wales to a low input, regenerative food system which recycles nutrients and produces within the natural carrying capacity of the land.

A <u>report</u> by Rayment (2019) for the RSPB, National Trust and the Wildlife Trusts assessed the financial resources needed to support land management actions required to deliver environmental priorities and targets across the UK. It is estimated that we need to spend £273 million annually on environmental land management in Wales to meet our priorities for the natural environment. This includes measures for sustainable soil and water management in agriculture, maintenance and restoration of priority habitats, boundary features and the historic environment, and support to maintain vulnerable high nature value farming systems. The report estimates that expenditure of at least £4 million is needed to provide advice and guidance to support environmental land management measures.

These estimates suggest that priorities for the natural environment can be met through the existing £300 million annual agriculture and rural development budget, but only if resources are reallocated to focus action on the provision of environmental public goods. The development of the new Sustainable Farming Scheme should include funding for pilots that trial new approaches to regenerative land management, and new mechanisms to support the delivery of environmental outcomes. This should be backed by advice and training for farmers and land managers, and information and communications to demonstrate results to the wider land management community. The costs of achieving this are included within the annual total estimated above and can be met from within the SFS budget.



3. Coasts			
STOP	REDUCE	START	
The continued degradation of coastal habitats such as seagrass meadows, seaweed and saltmarsh.	Coastal pollution from plastics.	An ambitious program to restore lost coastal habitats and protect the remaining areas around Wales.	

Protecting coastal habitats

There is an urgent need to stop the continued degradation of coastal habitats such as seagrass meadows, seaweed and saltmarsh by regulating activities that impact on these habitats and tackling systemic issues such as water quality by implementing higher water treatment requirements, including embracing nature-based solution such as wetlands restoration.

This action depends on the enforcement of water pollution regulations, which is costed in section 2 above.

A new publication by WWF - <u>The Future of Seagrass in Wales</u> - sets out an action plan listing 10 immediate, medium - and longer-term actions to protect and restore seagrass in Wales. The plan calls for Welsh Government investment of around £3.2 million in seagrass protection and restoration in Wales by 2030, which equates to an annual investment of £0.4 million per year for 8 years.

Reducing plastic pollution

Wales will come under UK wide proposals for an <u>extended producer responsibility</u> (<u>EPR</u>) scheme for all packaging waste, which seeks to ensure full cost recovery for all larger producers. The implementation of a <u>Deposit Return Scheme</u> for drinks containers, as well as the commitment to extend EPR to <u>litter payments</u>, are major priorities in tackling plastic pollution. This will be industry funded and therefore not demand public finance. However, commitment from Welsh Government to further the legislation is key to progress.

Priorities for additional funding to address the problem of plastic pollution are:

- 1. Employment of a volunteer co-ordinator in each coastal local authority area, to co-ordinate coastal litter collection, working with local authorities, Keep Wales Tidy (KWT), National Trust, SAS, MCS and other eNGOs and community groups. An annual cost of £70,000 per local authority area would include salary, overheads, expenses and communications, amounting to a total of £1.05 million per year across 15 coastal local authority areas.
- 2. A Wales level communications programme to raise awareness and education regarding the problem of marine litter. With an annual budget of £200,000, this would link to the Blue Flag Awards and other initiatives as well as the volunteer programme and provide educational resources for pupils and teachers.
- 3. A programme of surveys and monitoring of litter in public spaces, linking together street litter surveys, MCS Beachwatch and other surveys, and filling gaps. KWT has estimated the annual cost at £16,000 per local authority, which would amount to £350,000 across 22 LAs in Wales. These costs are based on the current litter survey model (which surveys 6% of streets in every local authority every year), extending this to a sample of all beaches. KWT currently uses its own in-house app for spatial mapping of litter survey data. There would be benefits from investment in more advanced technology for spatial mapping, at an initial cost of £100,000 for a research and development project.

The total annual cost of 3 actions above would be £1.615 million per year over the period 2023 - 2030.

Habitat restoration and re-creation

Wales should begin an ambitious programme to restore lost coastal habitats and protect the remaining areas around Wales, resulting in a 15% increase of coastal habitats by 203**1.udalen y pecyn 29**



The RSPB report Sustainable Shores estimates that 578 ha of intertidal Natura 2000 habitat will be lost in Wales – excluding the Severn estuary – by 2050 – suggesting a need to re-create 19 hectares per year for 30 years just to maintain the current stock of Natura 2000 intertidal habitat. The capital cost of this would be approximately £1.6 million annually, assuming an average per hectare cost of £84,000 (based on a review of recent intertidal habitat creation projects).

Expanding coastal priority habitats by 15%, in line with CBD commitments for ecosystem restoration, would require creation of 575 ha of maritime cliff and slope, 17 ha of coastal vegetated shingle, 1215 ha of coastal sand dunes and 1102 ha of saltmarsh. Applying unit capital and annual costs used by Rayment (2019) gives an estimated cost of coastal habitat creation of £81.6 million over 10 years, or £8.2 million per year for 10 years.

4. Seas			
STOP	REDUCE	START	
Unsustainable fisheries.	Conflicts between marine users and threatened wildlife.	Designating offshore Marine Conservation Zones and trialling stricter protection.	

Sustainable fisheries

The 2020 SoNaRR report states that, "for the most part, we don't have a good enough understanding of stock status and the dynamics of fishing effort, its distribution and resulting catches to be able to determine the sustainability of fisheries resources in Welsh inshore waters. There is consensus across industry, Welsh Government, and NRW on the need to progress with initiatives already underway, and augment with further planned work to better understand both the status of fish and shellfish stocks and environmental impacts of fisheries activities."

Welsh Government and NRW work together to undertake assessments of fish stocks and the impacts of fishing practices on them and the wider environment. Plans for management of stocks are delayed and need to be brought forward with urgency. In addition, WG and NRW also have a joint project to evaluate the impacts of fishing on features of Marine Protected Areas in Wales (the Assessing Welsh Fisheries Activities Project).

This project started in 2016, but no management measures have yet been introduced and assessments remain to be completed. Investment is needed to accelerate the process and enable the Welsh Government to meet its legal obligations under the Habitats Regulations. Completion of these assessments would be accelerated with the employment of an additional officer at NRW, at an annual cost of £60,000 including overheads.

The delay in the introduction of a bottom-towed order to deal with the high-risk assessments, which were published in 2017, has been attributed to capacity in the Welsh Government's legal department. In general, there is also a need to increase staff resources on fisheries science.

This is the responsibility of Welsh Government, but the delays to date suggest additional staff resources are required, ideally employing specialists in sustainable fisheries management. Employment of an additional six staff would require an annual budget of £360,000 including overheads.

Marine Development Plan

There is a need for a Marine Development Plan to guide development activity in the seas around Wales. This will be based on comprehensive evidence of the Welsh marine environment, the sectors using the sea (including fisheries, renewable energy, extraction, shipping and tourism) and the priority areas for economic development, built through a call for evidence and shared through a single portal. Prospective developers will be invited to submit proposals regarding sectoral development priorities. The development priorities for development, natural resource use



and marine conservation over a 20-year time period, informed through extensive consultation with stakeholders, business and the public, and implemented through a legal instrument. The Marine Development Plan would sit alongside the existing Welsh National Marine Plan and its policies.

Developing the plan is likely to take up to five years, employing 6 core FTE staff in WG and NRW (£360,000 per year including overheads), an annual evidence budget of £100,000, and a budget of £50,000 per year for IT, communications and events. The total cost would be £510,000 per year for 5 years. Similar levels of resourcing will be required to oversee implementation.

Marine conservation

The Welsh Government should start designating offshore Marine Conservation Zones (MCZs) by 2023 and trialling stricter protections for Welsh seas.

In announcing the results of its Biodiversity Deep Dive, the Welsh Government reiterated its commitment to protect 30% of Welsh seas by 2030 and stated that it will accelerate action to complete the marine protected area (MPA) network, to ensure the shortfalls in protection of habitats and features are addressed. This would be a significant contribution towards ensuring the MPA network is ecologically coherent.

While MPAs already extend to more than 30% of Wales's marine area, many site features are in unfavourable condition, have insufficient protection and conservation management, and are insufficiently monitored.

WEL has suggested that an appropriate target is that, by 2030, at least 30% of Wales's seas are within fully or highly protected MPAs (as defined by the IUCN), within the context of wider ecologically coherent networks. At least one third of this (i.e. 10% of Wales's seas) should be within areas fully protected by 2030 (based on IUCN categories).

Further resources are needed to swiftly complete work to designate MCZs, following an extensive process of evidence gathering and consultation, and to define priorities for protection, management and monitoring.

This requires a further 4 staff (2 at WG and 2 at NRW) at an annual cost of £240,000 (including overheads and expenses), as well as an additional £100,000 annual evidence budget and a £100,000 communications budget for 2-3 years. After that similar levels of resources will need to be allocated to implementation, monitoring and enforcement.

5. Peat			
STOP	REDUCE	START	
All activities that destroy peatland including burning and tree planting.	Significantly the use of peat by eliminating its use by public bodies and supporting UK ban on sale of peat for horticultural use.	Significantly increasing the scale and pace of peatland restoration.	

Peatland protection

There is a need to stop all activities that destroy peatland in Wales, including burning of peat soils (e.g. by farmers and grouse moor managers) and planting of trees on peatlands. This could be achieved by development of appropriate rules and guidance (e.g. for woodland grants and agri-environment schemes) and where necessary legal measures (e.g. to ban burning), as well as appropriate management of publicly owned land (including that of NRW, MoD and others).

Urgent action is needed to end the use of peat by public bodies, and to implement a ban on horticultural use of peat. A Peatland Policy Unit could be established to support this and to protect existing peatlands.

Staff and resour **Tendaler** eyepecyry or regulations and guidance to prevent burning and tree planting, oversee efforts to eliminate the use of peat by public



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bodies, develop legislation to ban horticultural use, and champion the restoration of peatland in Wales. This unit could employ two staff, at an annual cost of £120,000, including overheads and expenses.

Peatland restoration

There is a need to significantly increase the scale and pace of peatland restoration with a view to restoring 45,000 hectares by 2050.

The National Peatland Action Programme estimates that there are 90,052 ha of peatland in Wales of which 26,222 ha are in near pristine condition, and 63,830 ha require restoration (having been modified or used for agriculture or forestry).

The Biodiversity Deep Dive committed to increase the delivery capacity of the National Peatland Action Programme through a phased approach so that by 2030 the programme will be delivering at a scale capable of reaching the net zero 2050 target of 45,000 ha of peatland restored. To have 45,000ha of properly restored peatland by 2050 would require restoration works to have been completed by 2040, involving an enhanced rate of restoration compared to current plans; restoring 45,000 ha over 18 years would require restoring 2500ha/year. At an average restoration cost of £2,000/ha, the total annual cost of restoration would be £5 million.

The scale of need estimates in 2.2 above include annual costs for priority habitat bog restoration of £2.1 million; the additional costs of this action would therefore be £2.9 million. The rate of peatland restoration could be increased over time to enable peat to play a bigger role in contributing to net zero; private finance could also play an increasing role in this.

6. Grasslands			
STOP	REDUCE	START	
The loss of ancient meadows and other species-rich grasslands.	Significantly the use of all harmful chemical pesticides by a minimum of 50%.	Restoring and managing grassland habitats, including public green spaces, for wild plant diversity.	

Protection of meadows and grasslands

There is a need to stop the loss of ancient meadows and other species-rich grasslands through legal recognition and protection as irreplaceable habitats and strengthen the protection within the planning system. A similar approach is also needed for other irreplaceable habitats such as ancient woodlands.

This action would involve mapping irreplaceable ancient meadow and woodland habitats, then developing and communicating guidance on their protection through the planning system. This could be achieved through a three-year project, employing 3 staff at a cost of £180,000 per year including overheads. There would also be a need for a £200,000 evidence budget and a £100,000 budget for IT, events and communications. The total cost would therefore amount to £840,000 over 3 years.

Integrated pest management

At the COP 15 Convention on Biological Diversity in December 2022, the Welsh Government agreed to reduce the risk of pesticides by at least 50% by 2030 as part of the Kunming-Montreal Global Biodiversity Framework.

The use of all harmful chemical pesticides should be significantly reduced by adopting Integrated Pest Management in line with NFFN/PAN/RSPB Red Tractor recommendations and consider their expansion to UK domestic sales - including certified year on year usage reductions.

There is much evidence that adoption of integrated pest management can help to reduce costs to farmers as well as delivering benefits for biodiversity and the environment. However, while enhancing uptake of IPM is likely to reduce costs overall, there are barrater we provide the property of the farmer awareness, risk aversion and the



availability of independent agronomic advice. Pesticide use by local authorities should also be reduced substantially, such that pesticides are only used in exceptional circumstances, particularly in public places.

Increasing uptake of IPM is therefore likely to require enhanced awareness raising and provision of advice and guidance to the farming sector. This could be achieved by employing a team of IPM champions to work with the farming sector, food chain and other pesticide users such as local authorities across Wales to champion IPM and issue guidance. A team of three IPM champions, with a budget for communications and publications, would require an annual budget of £300,000.

Grassland restoration

Welsh Government should fund a programme to restore grassland habitats and manage our 30,000 miles of roadside verges and other public green spaces for wild plant diversity.

Action to enhance, restore and create semi-natural grassland habitats (at an annual cost of £65 million), and to enhance biodiversity and the provision of ecosystem services in agricultural grasslands, is included in the costings for farmland in 2. above. This should include wider use of conservation grazing to enhance grasslands and other habitats.

Improving the management of grass verges and public green spaces for biodiversity can be achieved at no net cost, as cutting is reduced, though there are implications in terms of planning and logistics, timing and equipment. These challenges could be addressed by employing a team of champions and advisors to work with local authorities and trunk road agents. These champions would work to raise awareness, liaise and provide guidance to local authorities, public bodies, businesses and the public to improve management of green spaces, road verges, business premises, parks and gardens. Employing a team of 5 would require an annual budget of £300,000 (including staff costs and overheads), as well as a communications and events budget of £100,000 per year. The total annual cost would therefore be £400,000.

7. Protected Sites			
STOP	REDUCE	START	
The damage and deterioration of Protected Sites across Wales.	Reliance on poor data available for Protected Sites.	To bring all Protected Sites into favourable ecological condition and scale up to deliver the 30 by 30 target.	

Site protection and monitoring

There is an urgent need to direct and resource Natural Resources Wales to stop the damage and secure appropriate management for all Protected Sites. This was recognised among the recommendations of the Climate Change Minister's recent Biodiversity Deep Dive into how Wales can meet the target to protect 30% of land, inland water and sea by 2030 (the 30 by 30 target).

NRW's 2020 Baseline Evaluation project looked to assess the condition of terrestrial and freshwater SSSI features; the first time since 2003 that an assessment exercise had been undertaken at this scale. The results showed that NRW currently has insufficient evidence to determine the condition of around half of the features on these sites (condition classed as unknown). For those features where evidence was available, only an estimated 20% were found to be in favourable condition. 30% were unfavourable, and the remaining 50% were 'not in a desired state'.

Addressing this will require improved staffing and resources at NRW for securing management, monitoring and enforcement. (We anticipate the bulk of the staffing and resource will be required by NRW but other statutory bodies - such as National Park Authorities - will also have an important role).

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Because of the scale of the gaps in evidence, the additional resource required to deliver the necessary levels of protected site management, monitoring and enforcement is not known. Following the baseline assessment, NRW will work in partnership with the environmental sector, landowners and communities in Wales to help shape and deliver an innovative action plan designed to improve current approaches to monitoring the health of protected sites in the future. This will inform the development of a more comprehensive terrestrial monitoring strategy for the future and help to address the evidence and site intervention challenges identified.

Current levels of staffing at NRW for the management and monitoring of protected sites are not precisely known but could amount to around 60 people. As a minimum, it is likely that this number would need to be doubled to address the challenges identified. This would require additional staffing costs of £3.6 million (including overheads, at a cost of £60,000 per FTE). There would be additional costs for equipment, evidence and contracted services, suggesting the need for an annual budgetary increase of at least £5 million.

Improving site condition

Investment is needed to bring all Protected Sites into favourable ecological condition by 2030, contributing to resilient ecological networks across Wales.

The costs of actions for European protected sites in Wales was estimated by the LIFE Natura 2000 project (NRW, 2015) at £144 million. These costs do not include staff time, ongoing maintenance work, or costs for strategic actions in Thematic Action Plans. Most of the actions identified have not yet been implemented. This is equivalent to £173 million at 2022 prices. If it is assumed that the costs of remedial actions for SSSIs as a whole are similar on a per hectare basis to those of European protected sites, the costs of actions across the whole SSSI network would amount to £288 million (since European protected sites comprise approximately 60% of the terrestrial SSSI area). The costs of annual maintenance of SSSIs in Wales were estimated in a recent report for the Green Finance Institute at £16 million per year. Overall, this suggests that £52 million per year is needed for SSSI restoration and maintenance over the eight years 2023 to 2030.

There is some overlap between these costings and those for sustainable land management (Section 2), diffuse pollution (Section 2), SSSI monitoring (Section 7) and invasive species (Section 10). It is estimated that 50% of management and remediation costs overlap with these other categories and 50% are additional. These additional costs include among others capital and direct management works relating to hydrology and flood/coastal erosion risk management, access and recreation management, investigations, education and awareness raising actions. The estimated additional annual cost for Wales is £26 million per annum.

The Welsh Government has committed to protect 30% of land and freshwater, and seas in Wales by 2030, in line with international commitments, and undertook a Deep Dive into delivery of this target in Wales during 2022. WEL has set out that to be counted towards the 30% areas should be protected for nature in the long term, appropriately managed and monitored, and in good or recovering condition. Achieving it should include designation of new SSSIs, as well as securing equivalent protection, management and monitoring across the remainder of the 30%. A strengthened focus on nature recovery in designated landscapes, as promised through the biodiversity deep dive, will be an important element.

As SSSIs currently account for only 11% of Wales, this would require additional identification of areas over 19% of Wales. The (one-off) costs of designating new SSSIs are estimated at £194 per hectare, based on estimates of staff costs and investigations and development of management plans. Based on this average cost, completion of the 30 by 30 network on land/freshwater would cost £76.6 million over 8 years 2023 - 30, or £9.6 million per annum over this period - although it is acknowledged that not all of the 30% will be established via SSSI designation, there will still need to be consideration of candidate areas and their management needs.

The 30 by 30 target requires that appropriate management should be in place by 2030, and monitoring will be essential to ascertain that areas are in good or improving/recovering condition. Therefore management and monitoring costs will increase in line with the areas identified over the coming years (although, again, it is acknowledged the infrage perspagation approaches will come into play, and the intensity and cost of these will vary).



8. Rivers and wetlands			
STOP	REDUCE	START	
The deterioration of water habitats due to pollution.	The barriers to migratory fish across Wales.	Upscaling deployment of nature based solutions, restoring wetland habitats and species, for flood and pollution management.	

Tackling water pollution

There is a need to stop the deterioration of water habitats due to pollution from agricultural activities such as dairy farming, intensive poultry units, from sewage discharges and from chemical pollutants by fully funding the enforcement of existing water pollution regulations, setting new and stronger civil sanctions for pollution offenders in the forthcoming agricultural legislation, and by ensuring that all permits in Wales are legally enforceable.

Urgent action is required to improve the condition of freshwater habitats in Wales. The 2021 WFD Classification data shows that only 40% of waterbodies in Wales are at Good Ecological Status, with a target of 100% by 2027. This is despite the current monitoring of water quality to be very likely under-estimating the overall degradation of our freshwater habitats.

NRW Compliance Reporting showed that 5 of the 9 SAC rivers in Wales are now failing for phosphate pollution.

The costs of additional staffing to increase enforcement are estimated in Section 2 above.

Migratory fish

Action is needed to reduce the barriers to migratory fish across Wales. Currently under WFD 2021 classification, barriers to migration are impacting 108 waterbodies, although it is suspected that there are a significantly higher number. In July 2022, NRW published its stock assessments for Salmon and Seatrout in Wales, internationally protected species alongside lamprey, shad and bullhead. The report concluded that 'This represents the worst level of salmon and sea trout stock performance ever recorded in Wales and is of major concern indicating that many stocks are now in serious trouble and at risk of failing to maintain sustainable populations in the future'. All rivers are now at risk of extinction of these iconic species. The NRW Plan of Action for Salmon and Sea Trout details resolution of barriers to migration as one of its top priorities, but at the current rate of delivery across Wales designated fish species will be lost before river restoration is achieved.

In 2018, NRW published 'A review of the economic value of angling in Welsh rivers'. This showed that based on historical studies, the net value of all river fishing in Wales to Welsh anglers is estimated as £3 million annually, capitalised at £30 million. The fishing industry was supporting directly 700FTE in Wales. In 2017, Lesley Griffiths, at the time Welsh Minister for the Environment, speaking in the Senedd referred to the value of fishing to the Welsh economy as £38 million. This included the economic benefit to Wales from associated income from tourism activities and significant support to rural communities in Wales.

Afonydd Cymru and NRW have mapped barriers to migratory fish in Wales and made some progress in assessing the costs of measures to resolve them. This agenda is evolving, as new barriers are found, costs are increasing through inflation, and as progress is being made in resolving existing barriers on some rivers (for example through the LIFE Dee River and 4 Rivers for LIFE projects). The current best estimate is that a further £25 million needs to be spent to resolve migratory fish barriers on Welsh rivers (£3.1 million per year over 8 years).



Wetland restoration

Investment is required to restore wetland habitats and species through nature-based solutions for flood management and pollution abatement.

Restoration and re-creation of wetlands have an increasingly important role to play in delivery of flood management and other nature-based solutions including pollution abatement, delivering multiple benefits for people and wildlife, often more cost-effectively than built infrastructure. However, natural flood management currently accounts for a small proportion of the Welsh Government's flood defence programme, which involves expenditure of £214 million over 3 years.

Welsh Government is trialling the wider application of natural flood management methods, using techniques such as tree-planting, leaky dams, salt marsh and dune restoration, the re-introduction of meanders and natural flood plains to reduce or slow the rate of run-off into rivers and hold back water where it is safe to do so or lessen the impact of coastal inundation and storm damage. In 2020 a £2 million pilot scheme was announced, with funding to be allocated over 2 years.

The full potential of NFM is difficult to predict and requires a case-by-case approach to assess the feasibility of nature-based solutions and integrate them into flood management proposals. However, as an illustration, allocating 10% of the flood defence budget to natural flood management techniques could generate funding of £7 million per year for habitat creation and restoration – this would not be an additional cost as it would reduce current hard defence investments.

9. Woodland and trees			
STOP	REDUCE	START	
The ongoing loss of veteran trees.	The loss of woodland biodiversity.	Increasing the pace of restoration and recovery of native woodlands and Celtic Rainforest.	

Protection of veteran trees

Action is needed to stop the ongoing loss of veteran trees by improving their care and protection.

The Ancient Tree Inventory records 169,967 ancient/veteran/notable trees in the UK of which 5.3% are in Wales, suggesting there are 9,000 recorded trees in Wales (Nolan et al, 2020). However, the authors suggest that the actual number of such trees is much larger than that recorded and could be as many as 2 million in the UK.

Based on advice from the Woodland Trust, the required actions for ancient and veteran trees are as follows:

- Develop the Ancient Tree Inventory (ATI), fully mapping ancient and veteran trees in Wales. Cost £173,000 per year, ongoing until at least 2030 (and including staff time, volunteer expenses, equipment and contracted surveys).
- Analysis of ATI data to assess distribution of ancient trees and identify threats and conservation priorities - one off research study with cost of £100,000.
- Risk assessment fund to finance risk assessments and inform conservation strategies for trees in high-risk areas (those threatened by development of buildings and infrastructure, and pressure from people) - £100,000 per year to deliver risk assessments for 100 trees annually.
- Farm advice service advisory visits to inform farmers about measures to protect ancient trees from machinery, livestock and chemicals. This would be delivered through the farm advisory service costed in Section 2.
- Fencing of ancient hedgerow. The SoNaRR report estimates the extent of hedgerows in Wales at 120,000km. According to <u>Buglife</u>, 42% of hedgerows in the UK are estimated to be ancient or species-rich. A <u>2011 survey</u> of farmers in England and Wales found that 73% had fenced hedgerows in the previous five years to exclude livestock. Double-fencing of just 5% of ancient hedgerows, targeting those most valuable and those most at risk, could require 2,500 km of hedgerows to be fenced, or **300aleney pecys 36**rs. At a cost of £12 per metre, the annual cost would amount to £3.6 million in Wales.



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The total cost of these actions would amount to £3.9 million per year over the period 2023-2030, in addition to farm advisory actions costed in Section 2.

Restructuring conifer forests

The loss of woodland biodiversity in Wales should be reduced by diversifying the composition and structure of conifer forests and managing open space for wildlife (increasing the requirement for species diversity and properly funding ride and riparian management).

The value of Wales's conifer forests for biodiversity could be greatly enhanced by diversifying their composition and structure when they are replanted, creating more open-space habitats and improving ride and riparian management. This could be achieved through incentive measures for private forest management, and habitat enhancement measures in the public forest estate, to be introduced when forests are replanted.

Typical costs of management of open ground habitats (lowland heathland and grassland) are £250 per hectare per year (from Rayment, 2019).

The UK Forestry Standard currently requires 10% of forest to be managed as open ground habitat for biodiversity, and this is a condition of grants. The area of coniferous woodland in Wales in 2021 was 152,000 hectares – 96,000 public and 56,000 ha private. Managing an additional 10% of this area as open ground habitats would create 15,000 hectares of open ground habitats in forests, at an annual management cost of £3.75 million, gradually phased in over the life of the forest rotation. Costs between 2023 and 2030 would amount to £2.7 million, or an average of £342,000 per year.

Further changes in woodland structure could be achieved through amendments to woodland standards and grant conditions. This could be achieved without additional costs, as Forestry Commission analysis indicates that financial returns from broadleaved and coniferous woodlands are comparable, while broadening the species mix also enhances resilience to climate, pests and diseases.

Woodland restoration

Investment is needed to increase the pace of restoration and recovery of ancient woodlands, especially those converted to conifer plantation, and threatened Celtic Rainforest across Wales and make this central to the delivery of the National Forest for Wales.

SoNaRR data indicate there are 95,000 ha of ancient woodlands in Wales, of which at least 41,790 are Ancient Semi Natural Woodlands (ASNW, 3,467 publicly owned) and 25,750 Plantations on Ancient Woodland Sites (PAWS, 11,433 ha publicly owned). A reasonable aspiration would be to bring two thirds of ancient woodlands in Wales into suitable protective and restorative management by 2030. This suggests a need for restoration of at least 53,600 ha (27,900 ha of ASNW + 25,750 ha of PAWS).

A Woodland Trust restoration project in England, funded by the Green Recovery Challenge Fund, involves restoration management work across 64 sites, and is considered broadly comparable of the type of restoration work needed across Welsh woodlands. The project has average restoration costs of £4089 per hectare overall, with those for PAWS averaging £2236 per hectare and ASNW £4959 per hectare.

Applying these unit costs suggests the total cost of restoration in Wales would amount to £196 million across both public and private land, an average cost of £24.5 million per year over 8 years 2023-30.

These costs are included within the estimated annual scale of need for environmental land management of £273 million included in Section 2. The scale of need figures estimate annual woodland restoration needs of £50 million, covering a wider area of priority habitat native broadleaved, mixed and yew woodlands and not just ancient woods.



10. Species			
STOP	REDUCE	START	
The direct mortality of species caused by humans.	The impact of Invasive Non-Native Species (INNS) on native wildlife.	Bending the curve of wildlife populations through a fully funded, long-term national species recovery programme.	

Species protection

Action is needed to stop the direct mortality of species by raising awareness and enforcement action to address persecution, disturbance, development, habitat damage and other pressures.

Wales has appointed a Rural & Wildlife Police Crime Coordinator, who co-ordinates action across the four police forces. This includes species action through groups dealing with Bird Crime and Mammals & European Protected Species. As well as legal enforcement, action is taken to raise awareness of the pressures on species through disturbance and accidental damage, and to train stakeholders to alleviate these impacts. For example, Operation Seabird has addressed impacts on seabirds, seals and other coastal wildlife from disturbance by boats, cliff walkers, climbers and other groups and activities.

This provides a good framework for action. However, effective action is constrained by limited resources, and funding is needed for publications (leaflets and posters for awareness raising), a website, training and events, travel and equipment, as well as employment of a part time communications and administrative assistant to support current and planned activities, at a total annual cost of £100,000.

Invasive Non-Native species

There is a need to increase resources for management to reduce significantly the presence of invasive non-native species (INNS). Action is needed to control invasive species in rivers and waterways, as well as in the terrestrial environment, and to implement biosecurity measures to prevent the further spread of invasive species.

A report by Wildlife and Countryside Link estimated the costs at UK level of biosecurity measures, as well as the employment of a national labour force for INNS control. The WCL report called on Government to commit to the recommendation of the Environmental Audit Committee (October 2019) report on invasive species, tripling the invasive species biosecurity budget to £3 million and providing a further £3 million to form a dedicated invasive species inspectorate. Additional annual costs are estimated at £5 million in the UK, of which £425,000 would be in Wales (based on share of land area).

The WCL report calls for additional investment in people to undertake management of widespread invasive species at a strategic scale. Scaling up the Local Action Group network to full capacity across the country would require an estimated 4,000 LAG staff, working with 75,000 volunteers and 2,000 contractors. Employing extra 340 staff in Wales (assuming recruitment is proportionate to land area) would cost £15.8 million (assuming £30k per FTE plus 55% mark-up for overheads). A volunteer budget would amount to £3.2 million (assuming annual expenses of £500 per volunteer per year) and contracting budget £1.7 million (assuming average expenditure of £10,000 per contractor). The total cost of IAS control would amount to £20.7 million per year in Wales.

Species recovery

Investment is needed to reverse the decline of wildlife populations through a fully funded, long-term national species recovery programme, involving the expertise and passion of people in Wales, to ensure that large-scale habitat restoration projects provide a resilient home for nature.

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The recovery of species in Wales depends on action to restore, re-create and improve the management of habitats, and to manage farmland for widespread species. In addition, there is a need for dedicated species recovery programmes, to deliver actions targeted at the needs of individual threatened species and groups of species. These include research, surveys, monitoring, advice and communications, species policy and licensing, and targeted site management actions.

The EU LIFE Nature Fund played an important role in funding species recovery projects in Wales, as well as large scale habitat restoration projects. An evaluation by ICF (2019) found that the total value of LIFE Nature and Biodiversity projects amounted to EUR 104 million between 2014 and 2017, an average value of EUR 26 million (£23 million) per year. Wales's share of this was approximately 12%, or £2.8 million annually, equivalent to £3.2 million at 2021 prices.

The <u>report</u> for the Green Finance Institute on the finance gap for nature estimated the cost of a programme to prevent extinction of red listed species in Wales at £86 million over 10 years 2022-31, an average of £8.6 million per year.

The cost of agri-environment actions to maintain the abundance of more widespread species were estimated at £41 million annually, based on the Rayment (2019) scale of need work. This estimate is included in Section 2 above.



Table 2	: Summary of total	costs of nature recovery actions (Em p.	a.)

Thoma		Action	£m	Total (£m)
1. Access and public participation		Invest in new urban green spaces	39.3	iotai (±iii)
	Wildlife rich green spaces	Increase urban tree cover to 20%	4.3	48.2
		Network of green space champions	2.2	
	Co-operative action	Pilot community empowerment projects	0.2	
	Environmental justice		2.2	
2. Farmland		Environmental standards body		
2. Farmiand	Regulatory enforcement Environmental land	Enforce pollution regulations	12.0	285.0
	management	Support nature friendly food system	273.0	200.0
3. Coasts	Habitat protection	Seagrass project	0.4	
	Reducing plastic pollution	Measures to reduce plastics litter	1.6	11.8
		Creation of coastal habitats	8.2	
	Habitat restoration	Intertidal habitat recreation to offset climate losses	1.6	
4. Seas	Sustainable fisheries	Fisheries assessments and management plans	0.4	
	Conflict avoidance	Marine development plan	0.5	1.3
	Marine conservation	Designate offshore MCZs	0.4	
5. Peat	Peatland protection	Peatland Policy Unit	0.1	F.4
	Peatland restoration	Peatland restoration programme	5.0	5.1
6. Grasslands	Habitat protection	Ancient meadows mapping and guidance	0.1	
	Pesticide reduction	Champion Integrated Pest Management	0.3	44.3
	Pollinators	Pollinator Champions	0.4	66.3
	Grassland restoration	Grassland restoration, creation, maintenance	65.5	
7. Protected sites	Monitoring and implementation	Additional staff and resources for SSSI monitoring and management programme	5.0	
	Site restoration and maintenance	SSSI restoration and maintenance	52.0	66.6
	New site designation	Designate new protected areas by 2030	9.6	
8. Rivers and wetlands	Migratory fish	Resolve barriers on rivers	3.1	
	Nature based solutions	Implement NBS through flood management budget	7.1	10.2
9. Woodlands and trees	Veteran trees	Map and protect ancient trees	3.9	
	Forest restructuring	Expand management of open ground habitats in coniferous woodland	0.3	28.7
	Woodland restoration	Restoration of ASNW and PAWS	24.5	
10. Species	Species protection	Awareness and enforcement measures	0.1	74.0
	Tackling IAS	Actions to control IAS	20.7	
		Increase biosecurity measures to combat IAS	0.4	
	Species recovery Tuc	Threatened species recovery programme	8.6	
		Replacement LIFE Nature Fund for Wales	3.2	
		alen y pecyn 40 Farmland actions for species abundance	41.0	

Table 3: Summary of net additional funding needs of nature recovery actions, after deducting current spending and double counting (£m p.a.)

Theme		Action	£m	Total (£m)
1. Access and public participation	Wildlife rich green spaces	Invest in new urban green spaces	39.3	
		Increase urban tree cover to 20%	4.3	
		Network of green space champions	2.2	48.2
	Co-operative action	Pilot community empowerment projects	0.2	
	Environmental justice	Environmental standards body	2.2	
2. Farmland	Regulatory enforcement	Enforce pollution regulations	12.0	12.0
3. Coasts	Habitat protection	Seagrass project	0.4	
	Reducing plastic pollution	Measures to reduce plastics litter	1.6	11.8
		Creation of coastal habitats	8.2	
	Habitat restoration	Intertidal habitat recreation to offset climate losses	1.6	
4. Seas	Sustainable fisheries	Fisheries assessments and management plans	0.4	
	Conflict avoidance	Marine development plan	0.5	1.3
	Marine conservation	Designate offshore MCZs	0.4	
5. Peat	Peatland protection	Peatland Policy Unit	0.1	3.0
	Peatland restoration	Peatland restoration programme	2.9	3.0
6. Grasslands	Habitat protection	Ancient meadows mapping and guidance	0.1	
	Pesticide reduction	Champion Integrated Pest Management	0.3	0.8
	Pollinators	Pollinator Champions	0.4	
7. Protected sites	Monitoring and implementation	Additional staff and resources for SSSI monitoring and management programme	5.0	
	Site restoration and maintenance	SSSI restoration and maintenance	26.0	40.6
	New site designation	Designate new protected areas by 2030	9.6	
8. Rivers and wetlands	Migratory fish	Resolve barriers on rivers	3.1	3.1
9. Woodlands and trees	Veteran trees	Map and protect ancient trees	3.9	
	Forest restructuring	Expand management of open ground habitats in coniferous woodland	0.3	4.2
10. Species	Species protection	Awareness and enforcement measures	0.1	
	Tackling IAS	Actions to control IAS	20.7	
		Increase biosecurity measures to combat IAS	0.4	33.0
	Species recovery	Threatened species recovery programme	8.6	_
		Replacement LIFE Nature Fund for Wales	3.2	
		158.0		

Total additional funding needs (£m p.a.)

158.0

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 report was written by economist Matt Rayment, commissioned by Wales Environment Link members and funded by WWF. We'd like to thank everyone who has been involved in this report's development; if you have any queries, please get in touch with WEL staff directly.







































































The need for a 'Nature Positive' Bill in Wales April 2023

Introduction

In June 2021, the Senedd <u>declared</u> a nature emergency and called for stronger action to address biodiversity loss, including statutory biodiversity targets and the establishment of a statutory governance body for Wales.

The Welsh Government supported this declaration, which is reflected in the updated Programme for Government embedding the <u>Co-operation Agreement</u> with Plaid Cymru. The Welsh Government has repeatedly promised legislation on environmental principles, governance and nature recovery targets; most recently it has been included in the <u>commitments</u> arising from the Biodiversity Deep Dive. However, the timeframe for bringing forward this vital legislation remains unclear.

In March 2023, WEL joined over 300 organisations under the banner of Climate Cymru in writing to the First Minister calling for the promised Bill – a 'Nature Positive Bill' – to be brought forward in the July 2023 legislative statement.

Why do we need a Nature Positive Bill?

We need this Bill to do two key things:

- Help Wales to avoid another lost decade for nature by establishing a duty on Welsh Ministers to achieve a Nature Positive Wales, implemented via a framework of legally binding nature recovery targets.
- Create a robust, independent environmental governance body to close the environmental governance gap that has existed in Wales since the UK left the EU.

In December 2022, the long-awaited Convention on Biological Diversity COP15 summit agreed the Kunming-Montreal <u>Global Biodiversity Framework</u>. It embeds a global mission to halt and reverse the loss of nature by 2030 and achieve recovery so

that, by 2050, nature is thriving once more, "sustaining a healthy planet and delivering benefits essential for all people". This is in line with the <u>Nature Positive</u> goal called for by organisations around the world in the years leading up to COP15.

The new Global Framework includes outcome-oriented goals and targets, to: halt extinctions and recover species abundance; tackle ecosystem loss; restore degraded ecosystems; effectively protect and manage 30% of land and sea (the '30 by 30' target); reduce pollution from all sources; and drive sustainable production.

There is a clear consensus that the new global targets must be more effective in driving action to stop and reverse biodiversity loss than their predecessors have been. We cannot afford another <u>'Lost Decade'</u> of inaction and decline, <u>when 1 in 6 species are already at risk of extinction</u> in Wales.

'Putting Wales on a Path to Nature Recovery', a report published in 2021 by RSPB Cymru and WWF Cymru and supported by Wales Environment Link, drew on evidence around targets from a range of different countries and policy examples. The report set out a clear case that an ambitious, legally binding set of long term and interim targets should be introduced to bolster Wales' current environmental legislation, and drive action for nature recovery at a pace and scale commensurate with the nature and climate emergency.

Legally binding targets, against which the Welsh Government can be held to account, will provide a strong imperative for the necessary mainstreaming of action for nature across all Ministerial portfolios and provide clarity for the public, voluntary and private sectors. They will help drive delivery of the wider suite of Biodiversity Deep Dive commitments, including transforming our protected sites, unlocking the potential of our designated landscapes, and supporting communities to drive nature's recovery. WEL's recently launched report – Pathways to 2030 – sets out some 10 key areas where public investment in nature's recovery needs to be increased.

There is precedent within the UK for this approach: nature recovery targets for England have been <u>established</u> in law under the <u>Environment Act 2021</u>. This Act also established the Office for Environmental Protection (OEP), a new independent

environmental watchdog, whose <u>remit</u> includes scrutinising and advising the UK Government on its delivery against these targets.

What should the legislation include?

1. A clear headline goal – Nature Positive Wales

As an overarching headline goal, we want to see a duty on Welsh Government to achieve a Nature Positive Wales. As the Minister for Climate Change has <u>said</u>, 'nature positive' is the rallying cry that nature needs. Achieving a Nature Positive Wales would mean:

- The systemic loss of nature has been stemmed by 2030 and nature is demonstrably on the path to recovery, with species and habitat indicators showing improvement against a 2020 baseline.
- Recovery of species and habitats by 2050 against a baseline of circa 1970, so
 that species abundance and distribution is on average rising, extinctions have
 ceased, and habitat quality and extent are increasing to the benefit of
 biodiversity.

This definition should be set out clearly in primary legislation so that Nature Positive is both meaningful and measurable. There should be key milestones along the way (e.g. 2035, 2040) to see species populations and habitats improving — so that nature decline is halted, site protection is enhanced, and recovery is well underway. This will be necessary to establish sufficient ambition, provide impetus for immediate action, direct the necessary finance and ensure maximum accountability for meeting the targets.

2. A framework of targets to measure progress against

Success in achieving a Nature Positive Wales will need to be measured based on a number of components. The primary legislation should include a duty to set long-term and interim, outcome-based targets in secondary legislation for: species abundance, species distribution, species extinction risk, habitat quality and habitat extent (including condition of protected sites and 30x30 (area protected and

effectively managed for nature)). Each component should be assessed across terrestrial, freshwater and marine biomes.

This set of targets aligns well with the concept of the 'resilience of ecosystems' set out in the Environment (Wales) Act, which lists diversity, extent and condition along with connectedness and adaptability as key aspects of ecosystem resilience. The State of Natural Resources Report, which NRW is required to publish towards the end of every Senedd term, provides an appropriate vehicle for reporting on these targets along with other environmental targets, although more regular updates on progress could also be required.

3. Reporting and accountability

Ministers should be required to set out detailed plans for delivering the targets, based on independent advice, and to report on progress. If adequate progress is not made, and/or interim targets are not met, Ministers should be required to set out their plans to remedy this to the Senedd and provide regular updates.

The Bill must also, as promised by the Welsh Government, establish a new environmental governance body for Wales. This body should have a remit to hold the Welsh Government to account in respect of its plans to meet the statutory targets, and progress made; Welsh Ministers should be required to show how they are taking account of the new body's recommendations.

The primary legislation must also include a duty to periodically review targets in light of available evidence and independent expert advice, supported by a power to amend targets to make them more ambitious where a need for this is identified.

The governance gap

When the UK left the EU, the role of EU institutions in providing oversight and enforcement of EU environmental laws ended. This governance framework provided accountability and access to justice for citizens, who were able to raise complaints with the European Commission, free of charge, if they felt their national government was failing to implement or abide by the law. The Commission could investigate,

advise, and ultimately take enforcement action. Our departure from the EU also meant the loss of a high-level framework of guiding environmental principles enshrined in the EU Treaties.

The Welsh Government recognised this governance gap, and promised in 2018 to take <u>"the first proper legislative opportunity"</u> to bring these environmental principles into Welsh law and to introduce new domestic arrangements for environmental governance. Ministers have since accepted the recommendations of a specially convened stakeholder task group on how to do this. These recommendations included:

- legislating to embed the core environmental principles with a high level environmental objective - into Welsh law, with a duty on Ministers to apply them; and
- establishing a new, independent environment commission to oversee the implementation of environmental law in Wales, including providing a route for citizens to raise complaints, powers to investigate breaches, undertake inquiries, and take enforcement action where necessary.

Equivalent laws have now been enacted for Scotland, England and Northern Ireland, and new bodies – Environmental Standards Scotland and the Office for Environmental Protection (the latter covering England and Northern Ireland) – have been created. In Wales, there is still no clear timeframe to bring this legislation forward, leaving us with a gap in our environmental legislation and a de facto weakening of protection, as well as a reduction in citizens' access to environmental justice (a right that is enshrined in the <u>international Aarhus Convention</u>).

Interim arrangements do not fill the gap

In lieu of legislation, the Welsh Government has produced internal guidance to support continued application of the environmental principles, and appointed an Interim Environmental Protection Assessor for Wales (IEPAW) who came into post on 1st March 2021. The initial two year tenure of the IEPAW has been extended by a further year, to February 2024.

The interim measures are welcome, but they are no substitute for statutory measures. The IEPAW's role is to consider concerns raised regarding the functioning of environmental law and provide advice to ministers (with ministers' responses to be published along with IEPAW reports). While people can raise relevant concerns free of charge, IEPAW cannot investigate challenges regarding compliance with environmental law by Welsh Government or other public bodies. Such challenges would need to be pursued via Judicial Review, which is inaccessible and costly.

In its <u>report on the interim arrangements</u>, the CCEI Committee stated: "Despite continuous calls from this Committee, and from our predecessor committee in the Fifth Senedd, for the Welsh Government to prioritise legislation to establish a statutory oversight body, there will be no Bill in year two of the legislative programme. As pointed out by the First Minister in his recent letter to us, the Welsh Government has committed to bringing forward several Bills in the coming year "aimed at creating a greener Wales". As welcome as this new law may be, it is imperative that environmental law is underpinned by a robust governance framework that provides effective oversight of implementation and accountability of government when it fails to deliver. This is sorely missing in Wales."

The report went on to say: "It would be unthinkable for a statutory oversight body not to be in place before the end of the appointment [of the IEPAW] in February 2024."

The Interim Assessor <u>affirmed</u> that "clearly, these interim arrangements are not as powerful as what was in place previously, and clearly that's something that we need to put in place in Wales so that we have more permanent arrangements in place".

Example: The Environment (Clean Air and Soundscapes) Bill highlights the governance gap

In March 2021, the Court of Justice of the EU <u>ruled</u> that the UK had systematically and persistently failed to fulfil its obligations under EU rules on air quality (after the European Commission started proceedings against the UK in 2014). Failures on air quality standards, by both UK and Welsh Governments, have also been challenged successfully in the domestic courts by Client Earth.

The Environment (Clean Air and Soundscapes) Bill establishes a framework for Ministers to set air quality targets for Wales. The Bill includes a process for Reporting on Targets (clause 5) under which Ministers have to report to the Senedd as to whether or not a target has been met. If a target has not been met, Ministers have to lay before the Senedd a report explaining why not, and the steps to be taken to rectify this.

The equivalent framework for England (under their 2021 Environment Act) includes an additional layer of scrutiny: the OEP reports regularly (e.g. this report on improving England's natural environment) on the UK Government's progress including assessing compliance with targets and commenting on the adequacy of policy measures to meet them. The UK Government is required to respond to the OEP's recommendations.

The OEP will also be able to consider any future challenges or complaints from citizens about failures to deliver on air quality targets, by the UK Government or other public bodies in England, filling the vitally important gap of providing access to justice for citizens once more. The IEPAW does not have the powers or remit to do either of these things. Until we have fixed this gap through legislation, the risk of environmental damage gone unchecked will only increase.

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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.



































Butterfly Conservation Wales

Gwarchod Glöynnod Byw Cymru













/ha



















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BD02 Environment Systems

Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee

Biodiversity and the nature emergency | Bioamrywiaeth a'r argyfwng natur

Ymateb gan Dr Katie Medcalf, Environment Systems| Evidence from Dr Katie Medcalf, Environment Systems

Written Evidence to Support <u>Climate Change</u>, <u>Environment</u>, <u>and Infrastructure Committee</u> to shape WG domestic response to COP15 outcomes through legislation, policy updating or implementing recommendations of the <u>Biodiversity Deep Dive</u>.

For ease of reading, this response has been drafted around the key targets and actions of COP15 and enacted through the activities of the Biodiversity Deep Dive, Nature Recovery Action Plan and Natural Resources Policy in Wales.

Environment Systems delivers natural capital evaluations, habitat mapping, climate change analysis and environmental monitoring and our comments reflect our experience in this field. We have highlighted where we feel initiatives could be strengthened or enhanced further, and where there may be further opportunities to deliver required outcomes by thinking 'out of the box'

High level response

Wales is amongst the world's most nature-depleted nations, so whilst there is both urgency and the need for ambitious action this must be carefully targeted, with the correct place based action to support nature recovery, if we are to deliver the targets by 2030. It will require cross-sectoral buy-in and effort to embed biodiversity as a core consideration across all sectors.

There is an inextricable link between the delivery of net zero targets and nature positive action, reflecting the dual crises. If we pass the 1.5°C threshold then retaining existing natural ecosystems that are already in poor condition, may not be possible, as their resilience to climate change is low. Action to strengthen resilience

of these vulnerable areas should be a priority, using an ecosystems approach. This will likely deliver co-benefits for reducing the impacts of pollution.

Protecting Ecosystems (at least 30% of land and 30% of the sea by 2030) We strongly support safeguarding critical areas for biodiversity and ecosystem function.

Our environment is our life support system, maintaining it and enhancing it's biodiversity will help us meet many of the challenges of climate change through working with nature to help store water and prevent flooding, capture and store carbon, purify pollutants such as nitrates and phosphates from water and reduce noise and air pollution.

Our environment is an inherently complex system with multiple interacting processes. Understanding the landscape context of our biodiversity rich areas is key to enabling us to protect and enhance them. The 30% restoration of degraded systems should represent the areas which are most robust to change, in particular climate change, this should be areas which match the DECCA Framework:

- Where specialist ecosystems are still functioning well and there is a good and maintained diversity of habitats and species
- Larger and 'rounder' patches, which are more resistant to change (noting intrinsically smaller habitats must also be afforded protection, such as quaking bogs formed from old glacial pingo features)
- Habitat patches with good connectivity to other habitat patches,
- Include areas in good ecological condition that can buffer change
- Areas with characteristics, such as large seed banks, that make them able to recover more rapidly in a changing climate.
- The development of Biodiversity Net Benefit and the DECCA Framework will help safeguard biodiversity and the ecosystem services they provide by requiring a holistic analysis of sites targeted for development.
- Our experience is that sophisticated spatial data modelling and mapping can assist decision making to identify the most appropriate areas to protect, especially when used in conjunction with field surveys at local level to avoid omitting important restorable areas that may not be captured through strategic scale mapping and analysis.
- Action taken to address environmental issues must consider the whole landscape context of a habitat patch; it is not enough to consider just the biodiversity rich sites in isolation:
 - For example, the recovery of a degraded but species rich, nationally important valley mire complex (which is also capturing carbon and storing a great deal of water), lying directly downslope of intensive arable land, cannot flourish because upslope pollutants will reach and adversely alter the site. Therefore, the solution requires a buffer around the arable fields, set up using nature-based solutions to help intercept and remove pollutants before they reach the valley.

- As well as protection through statutory designation, there is likely to also be a role for Payments for Ecosystem Service (PES) schemes, whereby land managers undertake long-term nature-based actions (such as native woodland planting) paid for via mechanisms such as water credits, biodiversity or carbon credits. Using the data collated for delivery of the Biodiversity Deep Dive Action Plan and spatial data it would be possible to identify target areas for these types of credit and predict the benefits to the habitat and ecosystems services. The market for these mechanisms is young, but significant headway is being gained where government funding supports local project groups who deliver the necessary land management changes, monitor outcomes and collect and distribute payments. We recommend that public guidance is enhanced to include guidance for claiming biodiversity, carbon or water credits.
- At a local level larger landowners / charities might want to sign up to deliver the 30 by 30 vision on their land, so enabling actions at a local as well as a national scale will be important. We see this as very advantageous, because, communication around the significance of biodiversity and its fundamental role in our lives in the light of climate change is key, involving local people will not only help spread understanding but will also help provide people a way of engaging in local action.

Protecting Species

- Some species are indicators of habitat health, ensuring they thrive by adequate protection and monitoring is essential. They can provide an early warning system for more action to be taken.
- Some species act as keystone species when they are lost the whole ecosystem degrades, action still needs to be targeted at their maintenance and health.
- We feel there is still a place for measurable outcomes for species recovery

Heading 3: Tackling Pollution

• The use of nature-based solutions to help tackle pollutants is advantageous to both industry and biodiversity and should be encouraged. Opportunity also lies in innovation within industry, but this requires support - for example, the injection of Farm Yard Manure has multiple benefits and significantly reduces pollution, yet the machinery required is beyond the reach of many dairy farmers. Supporting dairy farmers to access this machinery would significantly reduce pollution events especially in the streams and rivers in Wales.

Heading 4: Implementation and Domestic Targets

- The Biodiversity Deep Dive and other environmental policy has gone a long way to set the scene for Wales to successfully implement the COP15 targets.
- Applying innovation, for example using remote sensing and complex modelling to show ecosystem services enables us to have an increased

- understanding of our environment. If undertaken, these can be integrated into Local Development Plans to highlight areas for protection. Additionally, at the Design Stage of Development, this approach can highlight areas that should be actively considered as assets to a development scheme, ultimately resulting in an enhanced scheme.
- Biodiversity Net Benefit, the DECCA Framework, Nature Recovery Action
 Plan and Natural Resources Policy position planners well to help large
 infrastructure projects to change their attitudes and behaviours towards the
 natural environment. Formerly, biodiversity was something to mitigate against,
 rather than something that could be worked with to achieve positive outcomes
 for the development.
- In relation to Biodiversity Net benefit and DECCA, we strongly recommend that plans should be requested to show not only mitigation and enhancement requirements, but also how the wider environment is being considered in the planning Design Stage of a development.
- In order for this to be fully realised as described in the policy, further funding is required for policy teams to engage at an early stage with developers (to attend early meetings and help develop the best outcomes) well ahead of plans being submitted for consideration by planning departments. Although this is already part of their jobs, workload pressure on a scarce resource means it is not always realisable.

Heading 5: Funding Conservation

We fully support the need to consider biodiversity impact in budgetary
planning across policy areas. Understanding more fully, how the environment
is beneficial (e.g. mature trees for urban cooling and the wildlife they host).
This type of holistic thinking is not lacking in policy, but technological
advances in system thinking as well as an increasing understanding of the
importance of our environment and the danger of climate change may provide
a pathway to integration.

Heading 6: Additional Aspects The importance of monitoring

- Monitoring and measurement is essential to ensure actions are having the
 desired effect, designation of sites alone will not be enough. The effects on
 biodiversity arising from continuing with current land management practices in
 a changing climate change is not well understood. Management may well
 have to be altered to ensure biodiversity stays healthy. Monitoring target
 species is useful for tracking wider biodiversity health.
- New techniques of monitoring including eDNA tracking and in situ sensors and the use of other remote sensing technology are cost-effective options for monitoring programmes.

 Funding for on-site field surveys is also essential to identify environmental issues (new colonisations by invasive species, pollution events etc) that may not be visible using remote monitoring, are identified at an early stage.
 Mitigation will become far more difficult if problems are not identified and addressed early because of the pressure on sites already occurring as a result of climate change.

Climate Change

- Because of the impacts of climate change in the future, the next ten years is critical in building resilience for biodiversity in Wales and careful planning and targeted action will be needed to maximise the likelihood of success in achieving the 30 x30 target. In about ten years, we can expect to experience the effects of potential tipping points that are likely to severely stress or alter our natural systems, affecting species survival and habitat viability.
- The biophysical requirements of climate vulnerable habitats and species may
 no longer be met in their current locations. Nature recovery planning needs to
 build in knowledge of the vulnerability of habitats and key species, how this
 varies within Wales and how action will increase climate resilience. This can
 be assisted using spatial data analysis and modelling.
- Rapid progress and sustained support over multiple parliamentary terms, is essential.

BD03

Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee

Biodiversity and the nature emergency | Bioamrywiaeth a'r argyfwng natur

Ymateb gan Dr Tim Pagella, Prifysgol Bangor | Evidence from Dr Tim Pagella, Bangor University

A short paper on implementation of the COP15 International Agreement on Biodiversity

Dr Tim Pagella, Bangor University
June 1 2023

Introduction

[1] I was a member of the Biodiversity Deep Dive group and I broadly endorse the recommendations of that panel. As the focus of this session is on implementation, I feel that there are some areas that I would like to emphasise in the evidence I provide at this point around achieving that agenda. Implementation requires us to distinguish between high level target setting (i.e. setting out and agreeing the broad policy agenda around implementation) and delivery on the ground (operational implementation) and the links between these two elements. Below I will set out four areas that I regard as being critically important to effective implementation.

- 1. The need for Theories of Change
- 2. Integration of Landscape perspectives (and systems thinking)
- 3. Building buy-in for changes in tree cover
- 4. Institutional capacity

[2] Very briefly as a quick overview of my expertise. I am a Forestry Researcher based at Bangor University. My particular area of expertise focuses on trees on farmland (agroforestry) and I have twenty years of experience of working with people and trees on restoration projects both in Wales, in Europe and in broader development contexts in the Global South.

Section 1: Theories of Change

[3] The Biodiversity Deep Dive set out eight high level recommendations. These were quite broad in their focus, ranging from what I would describe as sensible iterations of existing

policy (for example 'Recommendation 3: Unlocking the potential of designated landscapes' to more ambitious recommendations e.g. Recommendation 5: Build a strong foundation for future delivery through capacity building, behaviour change, awareness raising and skills development) which begins to move us away from 'business as usual'. For implementation of the recommendations to be effective there is a need to plot an implementation pathway that a) sets out the recommendations in terms of their priority for implementation (i.e., which of these recommendations will likely deliver the most significant changes, to what degree can they be delivered concurrently and if they cannot be delivered at the same time, how will they be prioritised?) and ensuring that recommendations that steer us away from 'business as usual' are properly integrated at an operational scale (as these are likely to be harder to implement).

- [4] The first draft of the post-2020 global biodiversity framework included a high-level Theory of Change to describe this process. Similarly, an adapted version of the Theory of Change was presented in the initial Deep Dive documentation. A Theory of Change is a way of mapping out the steps and connections between an intervention's actions and the intended results. It helps us understand why and how we believe the intervention will work and what assumptions we are making. This is typically done through a diagram and a written explanation that provides the context and details of the intervention's logic, as well as how we plan to measure its success. Theories of Change are increasingly important in development projects (particularly large-scale restoration projects in the Global South where much of my research activity has focused). My advice then and now is that the recommendations needed to be integrated into an updated Theory of Change which sets out how we translate the high-level policy ambitions into operational deliverables on the ground.
- [5] Critically a Theory of Change emphasises the need to identify and provide evidence for specific cause-and-effect connections between the outputs and outcomes of an intervention. It outlines the expected paths through which the intervention will achieve its desired effects and establishes measurable indicators to gauge its progress over time. Additionally, it makes a point of explicitly stating the assumptions about these cause-and-effect relationships, including an analysis of the barriers and enablers that may influence the intervention's success.
- [6] The more ambitious suggestions proposed in the Biodiversity Deep Dive are likely to face several such barriers, given they divert away from business-as-usual model. A Theory of Change explicitly states what barriers are most likely to be encountered and sets out pathways to address them (i.e., it provides an explicit 'reality check'). For example, there are clear and obvious problems with delivery of the current iteration of the Sustainable Farm Scheme which seeks to impose area targets for tree cover and wildlife on farmers (strongly linked to achieving our biodiversity targets) this is very much viewed as an imposition by many farmers and will inevitably face significant resilience. We need to explore alternative mechanisms to achieve the same outcomes and understand and mitigate for the consequence of failing to meet this target by utilising other approaches (I have suggested a shift to a landscape target below). A Theory of Change is designed to address these issues transparently to provide confidence that an intervention will have durable and transformative impact.

[7] Where we are working with a high-level programme such as this (where we are effectively setting out a national agenda for change) we also need to look at developing 'operational' Theories of Change at the scales of implementation — as 'context' is critically important in prioritising actions and varies considerably around Wales. My use of the term "context" refers to the specific conditions (both biophysical and socio-economic), circumstances, and factors that surround a particular situation or decision-making process. It encompasses the environment, background, and relevant variables that may influence or shape the options available and the potential outcomes. These operational Theories of Change work best if they are developed in participation with local stakeholders. They explicitly look at how high-level changes are then converted into changes on the ground. No such Theories of Change exist at present and there is a 'missing middle' between the stated aspirations and implementation.

[8] Whilst I have discussed this in direct relation to the delivery of the Deep Dive recommendations, I feel that having an explicit, transparent framework describing the change logic is critical for bridging between high level policy and operational scales to deliver the biodiversity outcomes through any pathway proposed to achieve these goals.

Section 2: Actions at landscape scale (and the need for systems perspectives)

[9] Something that was also highlighted in the Deep Dive was the need to see our protected areas in their broader landscape context. The term 'landscape' is used frequently in relation to our aspirations for achieving out biodiversity objectives – and indeed is integral for enhancing habitat connectivity, for example. A landscape perspective is also critically important for understanding both positive and negative 'spill over effects' where ecological processes (and the consequences of different management actions) "spill over" from one habitat to another, influencing neighbouring areas. Monitoring and managing these spill over effects will be critical for maintaining and improving the functional integrity of the areas protected by the 30x30 goals and requires a broader focus on the habitats adjacent to those systems – in effect it requires a 'landscape' perspective.

[10] In my professional opinion we currently have very limited capacity to plan and manage at the landscape scale in Wales. We have very few people with the skill set to evaluate and direct interventions at landscape scale – nor are we strong at recognising emergent processes at those scales. This is a major institutional barrier and currently is likely to limit effective implementation. The area statements were designed, in part, to move us towards this goal but their implementation to date has not delivered against this objective.

[11] This is possibly best explained by using an example. A major concern I have is that climate change will quite rapidly drive changes in freshwater temperature across Wales: Rising temperatures can impact aquatic ecosystems by altering species composition, reducing dissolved oxygen levels, and increasing the likelihood of harmful algal blooms all of which create significant issues for biodiversity (and is an example of a negative 'spill over' effect that will impact protected areas). A relatively recent study by the Environment Agency (and others) found that enhancing riparian tree cover in headwater areas was the most effective mechanism for keeping streams cool (effectively by managing the shading regime

at source). At present tree cover in riparian areas in the headwater areas of Wales are very low and most of our catchments would be considered heavily degraded in this regard (and we have good data on this). Maintaining freshwater temperatures requires targeted tree planting in these headwater areas. At present a generic 10% tree cover target on farm does not deliver this outcome and no targeted measures exist. The adoption of a landscape perspective highlights the need for freshwater systems to be managed as a whole and enables the targeted landscape scale interventions required to achieve both the biodiversity and climate goals associated with them (by recognising that these are interconnected and interdependent systems).

[12] Framing interventions like this is also critical for local uptake of these measures—farmers and other actors are more likely to buy in to proposed interventions if they understand the rationale for the change. Generic targets (such as a 10% tree cover target on farm) make little sense to farmers whereas targeted action to achieve a specified goal helps to create a common concern entry point which improves participation that underpins the behaviour change required to deliver the goal.

[13] More broadly there is a need for systems perspectives that recognises that natural resources, such as forests, water, land, and biodiversity, are part of complex ecological and social systems that interact with each other and with human activities. Systems thinking involves explicit consideration of feedback loops, which are the mechanisms through which changes in one part of a system can influence other parts. Feedback loops can be reinforcing (positive feedback) or balancing (negative feedback). Identifying and understanding these feedback loops is essential for predicting and managing the dynamics of natural systems. While some of these feedback loops will be captured as part of our broader monitoring and evaluation many feedback loops, particularly those associated with social changes (such as drivers behind changes in management), are not typically a focus for monitoring and evaluation. Going forward it is my opinion that these are explicitly considered as part of future monitoring and evaluation activity (as set out in Recommendation 7: Develop and adapt monitoring and evidence frameworks to measure progress towards the 30x30 target and guide prioritisation of action).

Section 3: Building buy-in for changes in tree cover on farmland.

[14] Target 10 of the Kunming-Montreal Global Biodiversity Framework sets out the need to ensure that areas under agriculture, aquaculture, fisheries and forestry are managed sustainably, in particular through the sustainable use of biodiversity, including through a substantial increase of the application of biodiversity friendly practices, such as sustainable intensification, agroecological and other innovative approaches contributing to the resilience and long-term efficiency and productivity of these production systems and to food security, conserving and restoring biodiversity and maintaining nature's contributions to people, including ecosystem functions and services.

[15] This has relevance for Wales where agriculture dominates our landscape and farmland will be critical for the future delivery of biodiversity objectives and many public goods. Central to this will be how we manage and enhance tree cover on our farmlands (through better management of our farm woodlands and hedgerows or through the expansion of

agroforestry systems). Currently tree cover outside of woodland accounts for approximately a third of our tree cover but sits awkwardly between agriculture and forestry and is largely ignored. At present our approach has been to set central targets (either national scale tree planting targets or area targets at farm scale) neither of which are satisfactory solutions (not least as they ignore context — even small areas of targeted tree planting can deliver significant changes in ecosystem function if they are planted in the right place). In my opinion both are likely to be unsuccessful, for a range of reasons, especially given our recent history of tree 'expansion'. As suggested earlier, an area of concern is that these centralised objectives are likely to have very limited buy in from farmers which ultimately makes adoption challenging — this is an area where I have particular expertise.

[16] My strong suggestion is that instead of focusing on the tree targets we should instead focus on the behaviour change required to enable farmers and other landowners to change their attitudes to trees. Farmers can and will adopt trees on farms where they value the benefits that trees provide. To change farmers attitudes to trees it is important that our communication about trees focuses on the *in-situ* value of those trees (in terms of their ability to provide on farm functionality rather than solely focusing on the biodiversity emergency or the climate emergency which are seen as externally imposed). These functions would include shelter for livestock (both from wind and sun), soil stabilisation, soil health, and potentially diversified production (i.e., farm scale timber). All these interventions will also deliver immediate climate and biodiversity benefits (including significant below ground benefits) whilst moving farmers towards more sustainable and resilient farming systems.

[17] A shift of focus to behaviour change also recognises that adoption is unlikely to be even across all farms. There are farmers who naturally experiment and early adopters who capitalise on that experimentation. At the other end of the scale, we would expect that four out of ten farmers will show high reluctance to change. There will be little or no return from immediate engagement with these farmers. Understanding and mapping this helps with more effective and efficient delivery.

[18] Our aim should be to target those people (and areas) most likely to adopt trees; and highlight their successes (and learn from their failures). The aim is to normalise tree planting on farms so that it is something that farmers value and will do of their own accord (with support where appropriate). By changing the cultural values around trees on farm (by targeting and addressing the norms associated with them) we can completely change the dynamics around tree planting. There are several examples globally where this has happened – most notably with farmer managed natural regeneration is the Sahel. At present there are already farmers that are interested in regenerative farming practices and agroecology – we should attempt to capitalise on farmer led initiatives and work with them.

[19] Finally, there is a clear link between the need for landscape approaches and changes in tree cover. A simple shift of the 10% tree cover target from farm scale to landscape scale would provide an enhanced framework to enable farm to farm cooperation, deliver targeted changes in ecosystem function (see riparian cover in headwater section above as an example) particularly if those 'landscapes' incorporate upland and lowland areas – where

farmers negotiate with each other to deliver the target tree cover change. This shift of focus forces everyone to take a landscape perspective (which whilst it is a very different delivery model has several advantages over farm level implementation – not least making habitat connectivity interventions viable).

Section 4: Institutional Capacity

[20] All of the above have a common theme. They point to areas where currently we have limited institutional capacity in Wales. Whilst much of the emphasis has been on farmers and landowners to make the changes needed to deliver these objectives, I think it is critical that we also understand and enact the changes in behaviour required from our institutions to underpin these changes. At a time where we are actively seeking to have more trees on farms in Wales there is currently not a single person in either Welsh Government or Natural Resources Wales with the word "agroforestry' in their job title – and very limited capacity in these areas. There is very limited extension capacity to support farmers with tree planting and strong likelihood of farmers and other landowners getting mixed messages in communication around trees. In conversations I have with farmers there is very limited trust in government – and if this represents a national pattern presents a significant barrier to deliver of the COP15 recommendations. These barriers need to be acknowledged and actioned.

[21] In addition to farmer focused activity, I have highlighted the need for better systems understanding (particularly around scale) and social science specialists (who can engage with landowners around behaviour change and cultural norms). We are asking for a significant move away from business as usual and part of that discussion needs to focus on the skill sets (and capacity) required to deliver this. The farmers will only be able to deliver against this agenda with the right support in place – and this capacity is not currently there. This critically includes a shift to more participatory approaches. Again, this has become very normalised in development work in the Global South – but is largely and inexplicably absent in Europe and the UK.

[22] My final point relates to uncertainty. My impression is that policy wants to be seen as authoritative in an area where there is high uncertainty about what will work and what might not. I think it would be more helpful to acknowledge this uncertainty – and instead set out the principles that are feeding into policy design and implementation transparently and adopt a joint learning agenda that encourages experimentation and shares mistakes so that we can accelerate development of best practice.

Post Script

[23] I was advised not to provide explicit citations in the text I provided. I am happy to provide references that underpin the evidence I present today if required.



Climate Change, Environment, and Infrastructure Committee

Senedd Cymru

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Julie James AS,
Y Gweinidog Newid Hinsawdd

25 Mai 2023

Annwyl Weinidog

Ystyriodd y Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith lythyr y Prif Weinidog at y Llywydd ynghylch Bil Diogelu'r Amgylchedd (Cynhyrchion Plastig Untro) (Cymru) yn ei gyfarfod ar 29 Mawrth. Cytunodd y Pwyllgor y dylwn ysgrifennu atoch ynghylch y mater hwn.

Mae llythyr y Prif Weinidog yn awgrymu y dylai fod "cyfnod rhesymol" o "chwe mis fel arfer" rhwng pasio a chyhoeddi deddfwriaeth sy'n effeithio ar fasnach a dod â'r ddeddf i rym. Pan wnaethoch ymddangos gerbron y Pwyllgor ar 29 Medi 2022, fe gyfeirioch at hyn fel cyfnod segur a chadarnhau y byddai'n berthnasol i'r Bil Cynhyrchion Plastig Untro.

Fe ddywedoch chi wrth y Pwyllgor na fyddai cyfnod gras i fusnesau oherwydd bod Llywodraeth Cymru wedi ymgysylltu'n helaeth. Ychwanegoch y byddai'r chwe mis o gyfnod segur yn cael ei ddefnyddio i gefnogi'r cyfnod pontio.

Mewn ymateb i'r materion a godwyd gan randdeiliaid ynghylch yr angen i godi ymwybyddiaeth ymhlith cyflenwyr a manwerthwyr, dywedoch y byddai Llywodraeth Cymru'n defnyddio'r chwe mis o gyfnod segur i barhau i weithio gyda gweithgynhyrchwyr busnes, yr holl grwpiau sector cyhoeddus a chymunedau, a grwpiau nodweddion gwarchodedig i ddatblygu canllawiau cynhwysfawr i gefnogi'r Bil.

Byddwn yn ddiolchgar petaech yn rhoi diweddariad manwl i'r Pwyllgor ar unrhyw waith y mae Llywodraeth Cymru wedi'i wneud ar ddatblygu'r canllawiau manwl hyn. Hoffwn hefyd gael diweddariad ar unrhyw waith a wnaed ers pasio'r Bil i godi ymwybyddiaeth ymhlith busnesau ac unrhyw waith sydd i'w wneud cyn diwedd y cyfnod o chwe mis. Hoffwn hefyd i chi gadarnhau eich



bod yn dal i fwriadu gwneud rheoliadau yn cyflwyno gwaharddiad ar rai plastigau untro cyn gynted ag y bydd y chwe mis o gyfnod segur ar ben.

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 4.2

Correspondence from the Association of British Insurers – 16 May 2023 Gohebiaeth gan Gymdeithas Yswirwyr Prydain – 16 Mai 2023

Dear Mr Gruffydd,

I'm writing from the Association of British Insurers (ABI) regarding the <u>debate</u> on the Climate Change, Environment, and Infrastructure Committee Report—'Annual report on the National Infrastructure Commission for Wales—2022-23' which you took part in at the Senedd last week.

We were pleased to see the focus on flooding during this debate. Our sector is cognizant of the impact climate change is having in creating an increase in extreme weather events and insurers and long-term savings providers have long been at the forefront of efforts to better understand and prepare for risks resulting from impacts of the Earth's changing climate.

As a sector, we have long been calling for increased investment in flood defence maintenance and infrastructure spending and have welcomed the funding provided by the Welsh Government to combat flood risk and increase Wales' resilience to climate risk.

Alongside Flood Re, we published 'Modelling the Impact of Spending on Defence Maintenance on Flood Losses' in May 2021 which was carried out by flood risk specialists JBA Risk Management.

The report showed the cost effectiveness of maintaining flood defence infrastructure for every £1 increase in maintenance spending almost £7 is saved in capital spending on defences. The report also found that increasing current maintenance spending by 50% could extend the lifespan of defences by an average of eight years.

This research showed that the Average Annual Loss which represents the expected cost of flooding on average per year was £12.7m for residential property in Wales and £3.9m for commercial property.

I hope you find this information useful – if you would like to discuss any of these matters further, please do not hesitate to get in touch.

Kind regards, Callum

Callum JudgePublic Affairs Assistant
Association of British Insurers (ABI)

Llythyr at Llyr Gruffydd AS, Cadeirydd Pwyllgor Newid Hinsawdd

22/05/23

Annwyl Llyr,

<u>Blaenoriaethau Climate Cymru ar gyfer syniadau blaenrhaglen gwaith y pwyllgor</u>

Mae Climate Cymru yn glymblaid o dros 300 o sefydliadau a 14,000 o unigolion sy'n cydweithio er mwyn atal newid hinsawdd. Lansiwyd ymgyrch lwyddiannus gennym gyda galwad i ddod â 13,000 o leisiau i COP26 yn Glasgow, a pharhau i weithio gydag eraill i helpu i wneud newid cynaliadwy, hirdymor yng Nghymru. Gwnawn hyn drwy ymgyrchoedd fel ein gweithred Cynnes Gaeaf Yma sy'n canolbwyntio ar ryng-gysylltu costau byw, yr argyfwng ynni a'r argyfwng hinsawdd, trwodd i'n gwaith ar Natur Bositif a phontio i Net Sero, i'n Taith Werdd ar hyd a lled Cymru bob blwyddyn, gan arddangos y gwaith anhygoel y mae pobl yn ei wneud yn eu cymunedau wrth redeg prosiectau ynni adnewyddadwy a chynlluniau effeithlonrwydd ynni.

Fel y Pwyllgor sydd â Newid Hinsawdd a Seilwaith wrth wraidd popeth a wnewch, rydym yn gwerthfawrogi eich bod wedi ceisio blaenoriaethu eich rhaglen waith ac addasu i newid pan fydd deddfwriaeth y Llywodraeth yn eich cyrraedd. Rydym yn croesawu'r cyfle i gydweithio â chi, a byddem yn fwy na pharod i ddod i roi tystiolaeth, eich gwahodd i ymweld â rhai o brosiectau ein partneriaid ledled Cymru, neu eich cynorthwyo â gwaith polisi parhaus.

Ymgyrch Cynnes Gaeaf Yma

Rydym yng nghanol argyfyngau niferus – yr argyfwng costau byw, yr argyfwng ynni, a'r argyfyngau hinsawdd a natur. Mae'r argyfyngau hyn yn gysylltiedig ac yn cydblethu. Maent yn rhannu achosion ac atebion. Mae angen cymorth brys ar gyfer y rhai mwyaf agored i niwed. Y tu hwnt i hynny, mae'r atebion gorau ar gyfer llwybr gwirioneddol allan o'r argyfwng costau byw hefyd yn gamau allweddol er mwyn mynd i'r afael â sicrwydd ynni a'r argyfwng hinsawdd – megis effeithlonrwydd ynni ar raddfa gyflym a chyflwyno ynni cymunedol ledled Cymru. Mae'r achos ariannol ar gyfer y rhaglenni hyn hefyd yn gymhellol.

Oni bai ein bod yn cymryd camau brys a gwybodus yn awr, mae atebion tymor byr neu ffug mewn perygl o'n cloi i mewn i effeithiau gwaethygu newid yn yr hinsawdd ac argyfyngau ynni yn y dyfodol.

Rydym yn galw ar Lywodraeth Cymru a sefydliadau eraill i weithredu ar frys i sicrhau bod atebion i fynd i'r afael â'r argyfwng costau byw hefyd yn mynd i'r afael â'r argyfyngau hinsawdd a natur. Mae liferi sydd o fewn rheolaeth ddatganoledig angen eu defnyddio i gefnogi cartrefi bregus, ac i flaenoriaethu ynni adnewyddadwy a chynlluniau effeithlonrwydd ynni.

Hoffai ymgyrch Cynnes Gaeaf Yma yng Nghymru i Lywodraeth Cymru gyflawni'r canlynol, ac mae gennym ddeiseb agored ar hyn o bryd ar y mater hwn:

- 1. Cefnogaeth frys at aelwydydd bregus
- 2. Rhaglen effeithlonrwydd ynni uchelgeisiol
- 3. Cynnydd cyflym mewn ynni adnewyddadwy cost isel
- 4. Rhyddid rhag tanwydd ffosil

Byddem yn gwerthfawrogi pe gallai'r Pwyllgor ganolbwyntio rhywfaint o'i waith ar y themâu uchod. Rydym wedi anfon papur briffio manwl i bob Aelod Seneddol ar y testun ac mae digwyddiad gennym yn Nhy Hywel ar y 6ed o Fehefin er mwyn i ASau arwyddo addewid Cynnes Gaeaf Yma Cymru. Rydym yn aros am raglen Cartrefi Clyd newydd a diweddar i lywio gwaith ar effeithlonrwydd ynni yn y dyfodol.

Rydym hefyd yn dymuno i'r pwyllgor ystyried gwneud darn o waith ar y cyhoeddiad gan Lywodraeth Cymru ym mis Hydref 2022 i lansio datblygwr ynni adnewyddadwy sy'n eiddo cyhoeddus. Mae'r Gweinidog Newid Hinsawdd wedi dweud y bydd elw ynni a grëir yng Nghymru yn sicrhau mwy o fanteision i bobl Cymru, ac y bydd yr arian dros ben a gynhyrchir drwy'r datblygwr newydd yn mynd yn ôl i'r pwrs cyhoeddus i'w ailfuddsoddi mewn gwella effeithlonrwydd ynni mewn cartrefi yng Nghymru a chreu swyddi o ansawdd da, a chartrefi gyda gwell effeithlonrwydd ynni. Fodd bynnag, ers ei gyhoeddiad, ychydig iawn o fanylion cyhoeddus sydd am y datblygiad o dan sylw. Ochr yn ochr â'r sefydliad Cwmpas, rydym wedi ysgrifennu at y Gweinidog Newid Hinsawdd i drafod sut y gellir ei siapio. Er i ni gael ymgysylltiad cadarnhaol gyda gweision sifil, rydym yn dymuno i'r pwyllgor hwn ymchwilio i'r mater yn fanylach mewn perthynas â chymryd tystiolaeth gan cymdeithas sifil i ddeall yr hyn y mae pobl Cymru am ei weld yn digwydd yn hyn o beth, a'i gymharu ag enghreifftiau rhyngwladol lle mae'r Llywodraeth yn rhedeg eu system ynni eu hunain. Sut mae'r cwmni ynni yn buddio'r economi yn eu gwledydd priodol? Sut y gallwn sicrhau ein bod yn ei roi ar waith yng Nghymru ar ôl dysgu o arfer gorau mewn mannau eraill?

Natur Bositif

Mae angen i Lywodraeth Cymru gymryd camau brys i sicrhau ein bod yn trosglwyddo Cymru Natur Bositif i genedlaethau'r dyfodol. Natur yw ein system cynnal bywyd ac mae'n hanfodol i les pawb yng Nghymru. Ac eto, Cymru yw un o'r gwledydd sydd wedi'i disbyddu fwyaf o ran natur yn y byd ar hyn o bryd, ac mae ein bywyd gwyllt yn dirywio'n ddifrifol gydag un o bob chwech o'n rhywogaethau mewn perygl o ddiflannu o Gymru.

Gosododd COP15 genhadaeth newydd i atal a gwrthdroi colled byd natur erbyn 2030 a chyflawni adferiad fel bod byd natur yn ffynnu unwaith eto erbyn 2050. Dyma beth mae Natur Bositif yn ei olygu, a rhaid i Gymru chwarae ei rhan ei hun i gyrraedd y nod Natur Bositif. Mae targedau byd-eang yn y gorffennol wedi methu oherwydd na chymerodd Llywodraethau nhw ddigon o ddifrif gartref; gyda natur mewn argyfwng, rydym wedi rhedeg allan o amser oherwydd oedi ac ni allwn fforddio methu eto. Mae gadael yr UE wedi gadael bwlch llywodraethu amgylcheddol sylweddol, a ni yw'r wlad olaf yn y DU i fynd i'r afael â'r bwlch hwn yn ystyrlon – rydym ar ei hôl hi, ymhell ar ei hôl hi. Mae Bil Diogelu'r Amgylchedd newydd wedi'i addo "ar y cyfle cyntaf" a'i wthio'n ôl flwyddyn ar ôl blwyddyn.

Er mwyn cynnal enw da Cymru fel arweinydd amgylcheddol mae'n rhaid i Lywodraeth Cymru gyflwyno Bil newydd yn y rhaglen ddeddfwriaethol nesaf (2023-24), i osod dyletswydd yn y gyfraith i gyflawni Cymru Natur Bositif, wedi'i hategu gan dargedau adfer byd natur sy'n rhwymol yn gyfreithiol ac yn gadarn, llywodraethu amgylcheddol annibynnol.

Byddem yn croesawu unrhyw waith y byddai'r Pwyllgor yn ei ystyried yn addas i'w wneud ar y mater pwysig hwn.

Trosglwyddiad gyfiawn at Net Zero

Fel rhwydwaith rydym yn dymuno cefnogi'r gwaith sy'n cael ei wneud ar bontio i swyddi gwyrdd ar gyfer y dyfodol yng Nghymru, ac rydym yn awyddus i ni wneud hyn wrth ddeall yr heriau sy'n wynebu'r rhai mewn swyddi o fewn diwydiannau y mae'n rhaid eu trawsnewid. Mae syniadau a meddyliau diwydiant ynghylch sgiliau yn allweddol, yn ogystal â'r gwaith sy'n cael ei wneud gan Gymwysterau Cymru ar y mater ar hyn o bryd.

Mae llawer o'n partneriaid yn gweithio yn y maes hwn eisoes, ac mae ganddynt gyfoeth o brofiad ac arbenigedd i'w rannu. Tua'r nod hwn, rydym wedi cynnal bwrdd crwn o'r enw 'Swyddi Gwyrdd Da i Bawb. Cyrraedd yno gyda'n gilydd' ym mis Chwefror i geisio mynd i'r afael â rhai o'r heriau, a mynd i'r afael â'n nodau cyffredin. Roedd dros 70 o bobl wedi mynychu, ac roeddem wedi rhoi darn o waith gerbron Llywodraeth Cymru ar ei gwaith yn y maes yma.

Dymunwn sicrhau ein bod yn ystyried y darlun cyfiawnder byd-eang, yn enwedig wrth edrych ar ddiwydiannau sydd â phresenoldeb byd-eang neu gadwyni cyflenwi. Mae'n bwysig bod Cymru yn ystyried beth gallwn gneud fel cenedl sy'n gyfrifol yn fyd-eang, a sefyll mewn undod â chymunedau y mae newid yn yr hinsawdd yn effeithio fwyaf arnynt. Mae cysylltiad agos rhwng yr effeithiau newid yn yr hinsawdd a welwn yma yng Nghymru ac effeithiau o gwmpas y byd. Mae angen i ni ddeall ein heffaith fydeang yn well a mynd i'r afael â'r materion systemig sydd wrth wraidd anghyfiawnder hinsawdd – gan arwain at effeithiau gwaethaf y newid yn yr hinsawdd yn cael eu teimlo gan bobl sy'n byw yn y cymunedau tlotaf yma yng Nghymru ac yn fyd-eang, yn enwedig menywod a merched a'r rhai sy'n dod o gymunedau Du a Lleiafrifoedd Ethnig.

Ras at Sero

Mae Climate Cymru wedi bod yn annog Cynghorau Cymru i ymuno â Ras at Sero erbyn COP28. Rydym wedi ymgynghori â mwy na 300 o Bartneriaid Climate Cymru, a chyda'u cymeradwyaeth nhw byddwn yn cyflwyno Ymgyrch Cymru gyfan o'r Ras i Sero gan adeiladu undod rhwng cynghorau a'r cyhoedd. Mae awdurdodau lleol Cymru yn gweithio'n galed iawn i dorri allyriadau yn eu gweithrediadau eu hunain er mwyn bodloni ymrwymiad Net Sero y Sector Cyhoeddus – mae hyn yn waith pwysig. Ond mae ganddyn nhw hefyd rôl fwy hanfodol i'w chwarae mewn datgarboneiddio. Dim ond cynghorau lleol sydd mewn sefyllfa i arwain y gwaith o ddatblygu cynlluniau lleihau

allyriadau systematig wedi'u teilwra i anghenion lleol, ac i gydgysylltu'r ymdrechion sydd eu hangen i gyflawni camau gweithredu.

Nawr mae angen iddynt arwain datgarboneiddio ar sail Cytundeb Paris ar draws eu hardaloedd lleol. Mae deg o'r 22 awdurdod unedol yn y broses o ymuno drwy Brifddinas-Ranbarth Caerdydd. Ym mis Ebrill llynedd, ymunodd dros 100 o swyddogion hinsawdd â chyfarfod dwy awr a gynhaliwyd gan Gymdeithas Llywodraeth Leol Cymru i'w cyflwyno i Ras at Sero.

Mae Ras at Sero yn bwysig i gymdeithas sifil yng Nghymru oherwydd ei fod yn fframwaith glir ar gyfer gweithredu dros yr hinsawdd sy'n cyflwyno eglurder, trylwyredd, cysondeb a thryloywder, ac oherwydd ei fod wedi'i gynllunio i hwyluso cyfranogiad cymunedol wrth lunio dyfodol ein cymunedau carbon isel. Mae cyfoeth o egni, syniadau ac ymdrech wedi ei dan-ddefnyddion gan gymunedau ledled Cymru oherwydd yr ymagwedd anghyson ac afloyw tuag at ddatgarboneiddio ar sail ardal gan gynghorau.

Meysydd eraill o ddiddordeb

Bioamrywiaeth

Fel y soniwyd eisoes, mae gan Gymru lawer o ymrwymiadau cynlluniedig ar natur, diogelu'r amgylchedd a thargedau sy'n gweithio ochr yn ochr â fframweithiau carbon a hinsawdd sy'n bodoli eisoes. Rydym yn meddwl ei bod yn bwysig iawn bod hyn yn cael ei wneud yn gyflym, ac fel blaenoriaeth uwch o fewn amserlenni deddfwriaethol Llywodraeth Cymru; mae wedi bod yn siomedig gweld Bil Diogelu'r Amgylchedd yn cael ei wthio i lawr y ffordd, flwyddyn ar ôl blwyddyn. Byddem yn annog y Pwyllgor i barhau i wthio ar graffu gan Weinidogion o ran gweithredu a monitro'r targedau a'r addewidion hyn. Byddem yn annog y Pwyllgor i barhau i wthio sgriwtini Gweinidogol dros weithredu a monitro'r targedau a'r addewidion hyn, gan gofio mai cyfrifoldeb trawsadrannol yw hwn (nid yr Adran Newid Hinsawdd yn unig). Byddem hefyd yn dymuno dweud bod angen i bob aelod o'r Senedd sicrhau bod natur a hinsawdd yn rhedeg drwy eu holl waith.

Rydym yn wynebu difodiant rhywogaethau; rydym wedi gweld tanau gwyllt, llifogydd ac effeithiau dramatig ar gnydau, peillwyr a gweithrediad ecosystemau naturiol. Ochr yn ochr â Chyswllt Amgylchedd Cymru (WEL), rydym am weld byd natur wrth wraidd yr holl waith rheoli tir, yn enwedig o ran gwario arian cyhoeddus ar roi cymhorthdal i reoli tir.

Mae'r Gwasanaeth Natur Cenedlaethol yn bolisi arall sy'n cael ei esgeuluso ac sy'n hwyr, wedi'i osod o fewn y Tasglu Adfer Gwyrdd, ac rydym yn annog y Pwyllgor i fynd ar ei drywydd ar frys gyda Gweinidogion. Gallai hwn fod yn brosiect creu swyddi enfawr yn y sgiliau arbenigol sydd eu hangen ar gyfer y dyfodol ar gyfer y genhedlaeth nesaf, yn ogystal â bod yn ymateb priodol i argyfwng byd natur. Mae cyllid priodol ar gyfer atebion sy'n seiliedig ar natur a fframwaith llywodraethu cadarn i gyd yn hanfodol i ffyniant natur. Yn rhy aml, gwelwn gynlluniau a thargedau heb unrhyw adnoddau yn cael eu rhoi y tu ôl iddynt.

Materion o bryder nad ydynt wedi eu datganoli

Ystad y Goron

Rydym wedi ysgrifennu at bwyllgor Economi y Senedd yn ddiweddar i ofyn iddynt gwneud darn o waith ar yr uchod, ond mewn llythyr atom ar y 22 o Fai, dywedodd y Cadeirydd y byddai'n well gofyn i'ch pwyllgor chi ar y mater o dan sylw. Dymunwn, fellly, ichi gynnal ymchwiliad i'r posibilrwydd o ddatganoli Ystad y Goron i Gymru. Yn ddiweddar, cadarnhaodd yr Ystad chwe cytundeb ynni gwynt alltraeth newydd, gwerth tua £1 biliwn. Mae Ceidwad y Cyfrin Bwrs wedi ysgrifennu at y Prif Weinidog a'r Canghellor i rannu dymuniad y Brenin i'r arian hwn gael ei gyfeirio er budd ehangach y cyhoedd, yn hytrach nag at y Grant Sofran, trwy ostyngiad priodol yng nghyfran Ystâd y Goron sy'n ariannu'r Grant. Bydd un o'r 6 phrosiect wedi'i leoli oddi ar arfordir Gogledd Cymru, ac mae'n gyfle i wynt ar y môr gefnogi a helpu i dyfu economi Cymru. Mae rheolaeth ar Ystad y Goron yng Nghymru wedi ei ganoli yn San Steffan, ond eto yn yr Alban, mae'r rheolaeth wedi'i datganoli i Lywodraeth yr Alban ers 2017. Mae cefnogaeth gynyddol i Lywodraeth Cymru dderbyn yr un pwerau â'r Alban fel y gallwn elwa'n uniongyrchol o'r cyfleoedd economaidd a gyflwynir gan gynhyrchiad ynni adnewyddadwy posibl. Credwn y dylai'r Pwyllgor archwilio'r mater hwn, gyda golwg ar ddeall sut y gallai datganoli yn y maes hwn fod o gymorth i'n heconomi.

Elw cwmnïau olew a nwy

Rhyddhawyd elw ar gyfer y cwmnïau hyn yn ddiweddar, gydag adroddiadau yn y cyfryngau yn nodi bod cewri Olew yn gwneud elw o £5,000 yr eiliad tra bod miliynau yn parhau i gael trafferth gyda biliau ynni cynyddol. Mae dadansoddwyr yn rhagweld y bydd yr elw blynyddol wedi dyblu. Mae'r cwmni Chevron o'r Unol Daleithiau wedi cyhoeddi'r elw blynyddol mwyaf erioed o £28.6 biliwn, cynnydd mawr ar y £12.6 biliwn a wnaeth yn 2021. Bydd y toriadau treth enfawr ar olew a nwy a gyflwynodd y Prif Weinidog yn y dreth ar hap-safleoedd yn gweld y Trysorlys yn ildio yn y oddeutu £11 biliwn - mae hynny'n ddigon i roi codiad cyflog sy'n cyfateb i chwyddiant i bob gweithiwr ac athro GIG am flwyddyn. Mae angen i Lywodraeth y DU sefyll dros bobl gyffredin a thrwsio ein system ynni sydd, ar hyn o bryd, yn ein gorfodi i ddibynnu ar y cwmnïau hyn. Mae angen i'r Prif Weinidog gau'r bwlch yn y dreth ar hap-safleoedd, buddsoddi mewn ynni adnewyddadwy a dyfir gartref a'n rhyddhau rhag olew a nwy.

Byddem yn croesawu unrhyw ddatganiad cyhoeddus neu gyfathrebu gan y Pwyllgor i Lywodraeth y DU, ac ystyriaeth bosibl o sesiwn sgriwtini gyda chwmnïau yn y maes hwn yn y dyfodol agos..

Byddem yn gofyn i'r Pwyllgor ddangos cefnogaeth i alwadau'r sector ynni cymunedol (CEW a CEE) i allu gwerthu pŵer yn lleol i'w cymuned fel y cynigir yn yr adroddiad Mesur Trydan Lleol. Gan eu bod yn seiliedig ar asedau, gallant weithredu os yw'r rheoliadau'n caniatáu, ond yn y DU, nid ydynt yn gwneud hynny. Mae'n digwydd yn Ewrop, fel y gwelwch yn yr erthygl hon.

Crynodeb o gwestiynau allweddol y llythyr hwn

- a) Camau gweithredu gan y pwyllgor ar themâu allweddol Cynnes Gaeaf Yma-
 - Cefnogaeth frys at aelwydydd bregus
 - Rhaglen effeithlonrwydd ynni uchelgeisiol
 - Cynnydd cyflym mewn ynni adnewyddadwy cost isel
 - Rhyddid rhag tanwydd ffosil

- b) Byddem yn annog y Pwyllgor i gadarnhau gyda ni bod yn rhaid i Lywodraeth Cymru:
 - Osod dyletswydd mewn deddfwriaeth i sicrhau Cymru Natur Bositif drwy brif ffrydio gweithredu dros fioamrywiaeth ar draws holl bortffolios Llywodraeth Cymru.
 - Cyflwyno Bil Diogelu'r Amgylchedd i osod fframwaith ar gyfer targedau adfer natur sy'n gyfreithiol rwymol a chreu corff llywodraethu amgylcheddol annibynnol cryf i Gymru cyn gynted â phosibl.
 - Cynyddu buddsoddiad cyhoeddus yn adferiad byd natur, gan sicrhau bod gwariant holl adrannau'r llywodraeth yn adlewyrchu'r nod Nature Positive, yn ogystal â harneisio buddsoddiad preifat ym myd natur wrth gefnogi cymunedau, trwy farchnadoedd a reolir yn glos.
- c) Gwneud gwaith ar sut beth yw newid cyfiawn at Net Sero, a chreu adroddiad fel Pwyllgor ar y canfyddiadau.
- ch) Byddem yn annog y Pwyllgor i barhau i wthio Llywodraeth Cymru ar waith sgriwtini Gweinidogol dros weithredu a monitro targedau ac addewidion Bioamrywiaeth, gan gofio mai cyfrifoldeb trawsadrannol yw hwn (nid yr Adran Newid Hinsawdd yn unig).
- d) Byddem yn croesawu unrhyw ddatganiad cyhoeddus neu gyfathrebiad gan y Pwyllgor i Lywodraeth y DU ar dreth annisgwyl wirioneddol ar gwmnïau olew a nwy, ac ystyriaeth bosibl o sesiwn sgriwtini gyda chwmnïau yn y maes hwn.
- dd) Gofynnwn i'r Pwyllgor ddangos cefnogaeth i alwadau'r sector ynni cymunedol (CEW a CEE) i allu gwerthu pŵer yn lleol i'w cymuned fel y cynigir yn yr adroddiad. Mesur Trydan Lleol.
- e) gwaith ar ddatganoli Ystad y Goron,

Cofion cynnes

Bethan Sayed ar ran Tîm Climate Cymru

Correspondence from Daniel Therkelsen, Coal Action Network regarding Ffosy-fran opencast coal mine – 11 May

Gohebiaeth gan Daniel Therkelsen, y Rhwydwaith Gweithredu Glo, ynghylch mwynglawdd glo brig Ffos-y-fran – 11 Mai 2023

Dear Mr Gruffydd, Ms Finch-Saunders, Mr Irranca-Davies, Ms Jewell, Ms Rathbone, and Ms Watson of the Climate Change, Environment, and Infrastructure Committee,

I contact you about an urgent and ongoing threat to the Welsh Government's policies against new and extended coal extraction, and Wales' climate commitments. The Welsh Government is refusing to exercises its power under S182 of the TCPA 1990 to stop the ongoing illicit coal mining at Ffos-y-fran, where the local Council (Merthyr Tydfil County Borough Council (MTCBC)) has been unwilling or incapable of enforcing a stop on the coal mining despite an absence of planning permission for 8 months and counting.

Background

In response to the attached legal letter from our expert legal team, the Welsh Government said "Once the Council has taken its decision, and in the event it decides not to take enforcement action, the Welsh Ministers will require a reasonable period thereafter to consult and reach its own decision on enforcement action." The problem with this approach is that MTCBC has already stalled, and failed to take expedient enforcement action to stop around 1,000 tonnes of coal mining each day this goes on for (based on Coal Authority statistics). This inaction has so far resulted in 270,000 tonnes of coal, adding 840,000 tonnes of CO2 to our climate crisis - all without planning permission and in direct contravention of national policy.

This week <u>6,800 emails</u> were sent to MTCBC staff, imploring that they issue a *Temporary Stop Notice* to prevent further illicit coal mining and irreversible harm by the mining company, Merthyr (South Wales) Ltd, at Ffos-y-fran. But MTCBC continue to make vague statements about trying to meet with the company, arranging site visits, and negotiations around a restoration plan. It's more stalling, despite a unanimous decision of the MTCBC Planning Committee on the 26th April to reject the application to extend this coal mine. Over the next couple of days, Julie James and Lee Waters will receive <u>1000s of emails</u> from people demanding they step up to their responsibilities and actually implement the policies they claim to represent.

A summary of the case for immediate Government action

If the Welsh Government exercises its power under S182 of the TCPA 1990, it will be implementing a local democratic decision made by elected councillors, not overriding it. And immediate action is needed by the Welsh Government due to the contravention of its own policies and irreversible harm being caused on a daily basis (this is not in dispute - the local council has confirmed ongoing coal mining this week, and we hold photographic evidence). The LPA's failure to take expedient enforcement action to prevent this harm necessitates swift national Government intervention. If the Welsh Government continues to delay intervention, it damages the progressive green credentials of Wales. A policy is worth nothing if it's not acted upon.

Recent website post which hosts drone footage evidence of the coal mine in operation from the 19th May: https://www.coalaction.org.uk/2023/05/22/ffos-y-fran-the-uks-biggest-illegal-coal-mine/

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Will you raise this as a matter of urgency with Minister Julie James and the Welsh Government?

We would appreciate any details you are able to share on what action the Committee is able to take in this matter.

Regards,

Daniel Therkelsen

Coal Action Network

www.coalaction.org.uk

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



Ein cyf/Our ref: JJ/PO/145/2023

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

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

22 Mai 2023

Annwyl Gadeiryddion,

Yn unol â'r cytundeb rhyng-sefydliadol, gallaf adrodd wrth yr Aelodau imi fod yng nghyfarfod diweddaraf y Grŵp Rhyngweinidogol Sero Net, Ynni a Newid Hinsawdd ar 27 Ebrill 2023, ac y prif bwnc trafododd oedd buddsoddiad rhwydwaith grid a chydweithio rhwng y Llywodraeth.

Hefyd yn bresennol yn y cyfarfod yr oedd Mairi McAllan MSP, Ysgrifennydd y Cabinet dros Sero Net a Pontio Teg, Katrina Godfrey, Ysgrifennydd Parhaol yn Adran Amaethyddiaeth, yr Amgylchedd, a Materion Gwledig Gogledd Iwerddon, Graham Stuart AS, Gweinidog Gwladol Diogelwch Ynni a Sero Net, Gareth Davies AS a'r, Ysgrifennydd Trysorlys i'r Trysorlys.

Yn gywir,

Julie James AS/MS

Y Gweinidog Newid Hinsawdd Minister for Climate Change

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

<u>Gohebiaeth.Julie.James@llyw.cymru</u> Correspondence.Julie.James@gov.Wales

Bae Caerdydd • Cardiff Bay Caerdydd • Cardiff CF99 1SN

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.

Eitem 7

Mae cyfyngiadau ar y ddogfen hon