

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Blaenoriaethau ar gyfer y Chweched Senedd / Priorities for the Sixth Senedd
PR56

Ymateb gan Sefydliad Siartredig Ecoleg a Rheolaeth Amgylcheddol / Evidence from
Chartered Institute of Ecology and Environmental Management

CONSULTATION

Response Document



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

10 September 2021

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM has approximately 420 members in Wales who are drawn from across the private consultancy sector, NGOs, government and SNCOs, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

This response was coordinated by our [Wales Policy Group](#).

CIEEM is a member of:

- Wales Environment Link
- Scottish Environment Link
- Northern Ireland Environment Link
- Wildlife and Countryside Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

We welcome the opportunity to participate in this consultation and we would be happy to provide further information on the topics outlined below. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries. We confirm this can be published with our organisation name.

Thoughts on the Minister and Deputy Minister's priorities for the next 12-18 months

We welcome many of the focus areas set out by the Minister. Of particular relevance to us and our members is nature and biodiversity, climate change, tree planting, environmental governance and planning.

Climate Emergency and Biodiversity Crisis

This committee plays a crucial role in ensuring ambitious action to address the climate emergency and biodiversity crisis is delivered by the Welsh Government. These are particularly crucial issues over the next year when COP15 and COP26 will demand transformative change across the world, with tools such as the Edinburgh Declaration highlighting the importance of the subnational constituency.

The climate emergency and biodiversity crisis must be addressed in tandem and [Nature-based Solutions](#) (NbS) – in combination with radically reducing carbon emissions through halting fossil fuel usage – offer the only proven ways to achieve climate and biodiversity goals simultaneously, in the timeframes needed to avert climate and biodiversity catastrophe. This committee can play an important role in ensuring the Welsh Government's commitment to integrate these issues into all areas of government is achieved, and that NbS are central to this.

Tree Planting/Carbon and Habitats

The stated purposes of meeting Welsh Government's net zero target and increasing levels of carbon sequestration through land management in the proposed Sustainable Land Management Scheme, must be delivered in tandem with the ambition to increase biodiversity and ecosystem resilience. For example, we welcome the proposals to utilise strategic opportunity mapping for forest expansion, however, it does not provide the detail required to ensure planting will not harm existing biodiversity of conservation importance or to achieve a net biodiversity gain. This is achieved through site-specific Environmental Impact Assessments. Similarly, any earned recognition approach must not undermine the need for detailed assessments of the impact on other habitat types and biodiversity.

Any tree planting should follow the principle of 'the right tree in the right place', i.e. using native species of local provenance where possible and avoiding 'planting up' of key open habitats that are not only important for biodiversity, but may also have a higher carbon capture capacity. Any tree planting programme on existing habitat of conservation value should be subject to an Environmental Impact Assessment.

Action to address the climate emergency through Nature-based Solutions must utilise the full suite of high-carbon habitats. For example, bog restoration/preservation is equally important for carbon sequestration and biodiversity, and is a major habitat in Wales, but does not receive the same attention as planting trees. When they are degraded, peatlands act as a source of greenhouse gases, and have reduced biodiversity and capacity to improve water quality. Converting just one hectare of drained blanket bog back to intact blanket bog

can result in around five tonnes of carbon dioxide equivalents per year and so must be a priority¹.

This Committee should ensure the implications of such large-scale land use change and how proposed tree planting will be achieved to ensure it is best contributing to overall carbon sequestration and biodiversity protection/ enhancement. The Committee may wish to ensure Welsh Government is in fact considering the full suite of high carbon habitats, as outlined in further detail in the report referenced above.

We would be happy to provide further evidence on these issues.

Environmental Governance

The lack of detail regarding progress on developing permanent governance arrangements is concerning and it appears there is a lack of urgency to ensure a new statutory system and environmental principles are in place.

While it has been indicated by Lesley Griffiths that a Bill on environmental governance and principles could be brought forward in Year 2, there is still no firm commitment. Permanent arrangements must ensure:

- All public bodies should have a duty to act in accordance with the four European Union (EU) environmental principles in addition to the environmental principles set out by international conventions and agreements.
- A new, truly independent, environment body replaces the role of the European Commission. The role of the new body must be four-fold: reporting, advising, investigating, and enforcing. The human right to environmental justice and access to environmental information must be protected.

Additional topics to be prioritised

Legally binding targets

We strongly support the Senedd resolution that formally declared a nature emergency and called on the Welsh Government to introduce a legally binding requirement to reverse biodiversity loss through statutory targets. Current indications from Welsh Government are that these could be included in the environmental governance Bill outlined above. If that is the case, the targets must align with the Post 2020 Global Biodiversity Framework to be agreed at COP15 and must be brought forward at the latest in Year 2 if 2030 targets are to be met.

Targets should include both long-term and legally binding interim targets, and be developed in consultation with experts and based on evidence.

Role and resourcing of NRW and Local Authorities

We welcome positive commitments from Welsh Government regarding building resilient ecological networks and the significant shift in agricultural payment schemes towards delivering public goods. However, for these to be successful in achieving more resilient and

¹ <https://cieem.net/resource/carbon-and-ecosystems-restoration-and-creation-to-capture-carbon/>

nature positive land management, Natural Resources Wales and Local Authorities tasked with delivering them must be fully funded and have sufficient in-house expertise.

NRW's capacity to deliver its regulatory duties, in addition to this more proactive leadership role in delivering for nature, has been a topic of concern for many. The new Climate Change Ministry must provide them the prominent support they need.

We recommend the Committee ensure NRW has sufficient resources, capacity and skills to deliver these programmes and Local Authorities have access to the ecological expertise needed to ensure ecological networks, and Net Benefits for Biodiversity in planning, are delivered.

Planning and Green Infrastructure

Future Wales 2040 incorporates welcome commitments, including those on resilient networks, green infrastructure and NbS as mentioned previously. Policy 9 includes a commitment from Welsh Government to:

- *“identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- *identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.”*

Alongside Section 6 of the Environment (Wales) Act 2016 which creates a duty for public authorities that exercise their functions in relation to Wales to maintain and enhance biodiversity and promote the resilience of ecosystems, Future Wales includes a welcome statement that *“In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit) the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.”*

Welsh Government takes a broader view to Net Benefits for Biodiversity than is taken in other UK countries, looking at wider ecosystem services and resilience as opposed to only net gain in biodiversity units. There are, however, questions around how these gains, over and above what was previously on site, are measured and registered as having been achieved over time, and whether the capacity is available to monitor this.

CIEEM, together with CIRIA and IEMA, has been at the forefront of exploring the potential for a biodiversity net gain approach in England and Scotland. In December 2016 we published the first UK Principles on delivering biodiversity net gain through development following extensive consultation with stakeholders. In February 2019 we published new guidance on how to deliver net gain in practice².

Additionally, Area Statements are a material planning consideration and development plans should set out appropriate policies to safeguard and connect these areas. Clarification of funding streams that will be available for maintaining, monitoring and creation of sites and

² <https://cieem.net/i-am/current-projects/biodiversity-net-gain/>

the implementation of the Areas Statements, and ensuring that a cycle of reporting is established with regards to progress within each Area Statement region, would be a useful role for the Committee.

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