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Snowdonia Society**

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Climate Change Environment & Infrastructure Committee

Senedd Cymru

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September 2021

**Priorities for the Sixth Senedd 2021-2026**

**Response from Cymdeithas Eryri Snowdonia Society**

Cymdeithas Eryri is Snowdonia's conservation charity, established in 1967.

Our focus is on:

- action to protect and enhance the special qualities of Snowdonia
- supporting responsible and sustainable enjoyment of beautiful landscapes.
- expertise in bringing diverse volunteers into the work of looking after special places.
- opportunities for young people to build skills, knowledge and experience through volunteering, accredited training, work experience and paid employment.
- Working in close partnership with public bodies, the third sector and businesses to care for Eryri.
- engaging across Wales and beyond, through active membership of Wales Environment Link, the Alliance for Welsh Designated Landscapes and Campaign for National Parks.

We are grateful for the opportunity to submit our views on the priorities for the sixth Senedd.

**Summary of priorities for the sixth Senedd**

1. Identify the resources and pathways to enable National Parks to lead landscape-scale action on climate action, nature recovery, sustainable tourism, sustainable land management, public engagement and well-being.
2. Investigate whether the tools available – including the Wales National Marine Plan - for the 'sustainable use' of our seas - are sufficient to deliver the necessary protection of Wales' waters in the light of the climate and biodiversity emergencies.
3. Establish clarity on the relationships and the differences between the climate emergency and the biodiversity emergency, and the responses needed if both are to be addressed.

4. Rigorously pursue a solid legislative base for environmental governance, along with clear processes, fair public access to environmental justice, and robust remedial powers.
5. Embed nature restoration targets in domestic law to provide accountability and focus attention on achieving the targets and milestones, aligned with development of meaningful biodiversity indicators under the Wellbeing of Future Generations Act.
6. As part of post-legislative scrutiny of the Environment (Wales) Act, review the statutory purpose and leadership role of Natural Resources Wales, with emphasis on the resources and priorities needed to respond effectively to the biodiversity emergency.
7. Investigate monitoring and reporting requirements, to ensure the ability to report effectively against Welsh, UK and international commitments as legislative divergence increases into the future.
8. Consider the scope and scale of the training needs for Wales to deliver on nature, climate and environment, with particular reference to the needs of the Sustainable Farming Scheme.
9. Enable Welsh Government to be honest and open with the people of Wales on recycling - specifically where it all ends up - to lead us beyond the current focus on collection targets to more meaningful change.
10. Investigate how a National Nature Service for Wales might be designed, tested and supported, and what role Welsh Government might play.
11. Maintain a laser focus on matching Welsh Government's actions to its words, for example with reference to the re-assessing the costs and benefits of new roads in the light of the biodiversity and climate emergencies.

## **1. Optimising opportunities via National Parks**

The most effective and most sustainable carbon storage solutions on the planet include restoration of damaged peatlands and maintenance of condition of healthy peatlands<sup>1</sup>. One third of Wales' peatland resource is found in Snowdonia National Park alone. A quarter of Wales' land area is designated as National Park or Area of Outstanding Natural Beauty. It is therefore a concern that the Minister's letter to the CCEI committee<sup>2</sup> dated 30<sup>th</sup> July 2021 makes no mention of National Parks, AONBs or protected/designated landscapes. The Minister's letter references climate change many times, and biodiversity loss a few, but seems not to establish the links between these challenges and some of the largest mechanisms available to tackle them – the landscape-scale working of National Park Authorities (NPAs), their purposes, their extensive partnerships and their established ability to work at scale with land managers.

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<sup>1</sup> <https://www.iucn.org/resources/issues-briefs/peatlands-and-climate-change>

<sup>2</sup>

<https://business.senedd.wales/documents/s116925/Letter%20from%20the%20Minister%20and%20Deputy%20Minister%20for%20Climate%20Change%20on%20the%20Welsh%20Governments%20priorities.pdf>

This omission is surprising given Welsh Government's previous and widely welcomed emphasis on the role of National Parks in mitigating and adapting to climate change in its 'Valued and Resilient' policy statement<sup>3</sup>. In recent funding letters to NPAs, Welsh Government has identified the crucial role of National Parks in tackling the climate emergency, highlighted the importance of the next few years as the time to take action, and acknowledged that a lack of NPA capacity is holding back work on biodiversity and climate change mitigation.

We would urge a focus on identifying the resources and pathways needed to enable National Parks to lead by example on landscape-scale action, using their unique positioning to join up the dots between climate action, nature recovery, sustainable tourism, sustainable land management, public engagement, well-being and the national curriculum.

## 2. Seascapes of Wales

Significant parts of the North Sea have been developed to the extent that they are now industrial seascapes. It is not too late to prevent that happening, on a piecemeal case-by-case basis, in the most sensitive areas of our marine environment, both above and below the waves.

We urge the Senedd to consider whether all the right tools are available to deliver the necessary protection of Wales' waters, including scrutiny of the Wales National Marine Plan for the 'sustainable use' of our seas.

Robust zoning of Welsh seas with large-scale 'no take' and 'no development' zones between the Conwy and the Cleddau could transform our understanding of the value and potential of our seas. With vision, Wales could take forward at scale the kinds of initiatives that are delivering multiple benefits for some coastal communities<sup>4</sup> in Scotland.

## 3. Understanding different challenges

Climate change and biodiversity loss are not interchangeable; they are certainly related but they aren't identical twins. The biggest impacts on biodiversity in Wales today, as for the past seven or eight decades, are dictated not by climate but by more direct human interventions.

On 16<sup>th</sup> June 2021, in response to a question on the biodiversity crisis<sup>5</sup>, the Minister for Climate Change, Julie James replied "*...we see it as another part of the climate emergency.*"

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<sup>3</sup> <https://gov.wales/written-statement-valued-and-resilient-welsh-governments-priorities-areas-outstanding-natural>

<sup>4</sup> <https://www.arrancoast.com/no-take-zone/#:~:text=COAST%20helped%20create%20Scotland's%20first%20No%20Take%20Zone&text=Lamlash%20Bay%20No%20Take%20Zone,seabed%2C%20including%20the%20shore%20area.>

<sup>5</sup> <https://www.bbc.co.uk/news/live/uk-politics-parliaments-57428186>

A key risk here is that the best efforts of Welsh Government fail to address the biodiversity emergency effectively because of a misplaced belief that action on climate will tackle both the climate and biodiversity emergencies. Importantly, some climate actions - focused on hardware and infrastructure rather than on reducing energy/resource needs and consumption - have the capacity to significantly worsen the biodiversity emergency.

Whilst action is what we need most, words matter too. The Minister's title is an important signifier, reflecting the thinking around the role and what it delivers; we believe Wales deserves a Minister for Climate and Biodiversity Action?

#### **4. Legislation to address the environmental governance gap in Wales.**

All of Wales needs to be engaged with the environmental challenges we face. All of us need to be taking action; individuals, businesses, the third sector and public bodies all need to play our part. The most effective strategy and leadership will come from a government which is in touch with those on the ground. We are a small nation, so we should be closely enough connected to work that way, if there is a basis of trust. Trust is the currency of leadership.

For more than 5 years we and our partners across Wales have been highlighting the post-Brexit environmental governance gap.<sup>6</sup> Welsh Government's action on closing this gap has been inadequate; it would be generous to describe progress to date as 'minimal'. In the Senedd debate on declaring a nature emergency on 30<sup>th</sup> June 2021, Mabon ap Gwynfor MS said:

*"The reason I'm talking specifically about Cymdeithas Eryri is to show that the actions happening at the moment to safeguard nature and biodiversity are reliant on individuals and small and large charities on a local and national level. There are thousands of other volunteers doing similar work for other organisations too, of course. But we can't rely on volunteers. They and the charities and organisations working in this area, such as Cymdeithas Eryri, want national guidance, and they want the Government to act too."*

Intense focus and rapid progress are needed on this fundamental issue, to secure the accountability which underpins all environmental protection. We ask the sixth Senedd to be rigorous in pursuing a solid legislative base, clear processes, fair and open public access to environmental justice, and robust remedial powers.

#### **5. Statutory targets for nature restoration**

We support Wales Environment Link in believing that for Welsh Government to seriously address the nature crisis in Wales it will need to show leadership, support ambitious global targets to restore biodiversity and embed targets in domestic law. This will provide crucial accountability and focus attention on achieving the targets and milestones, in the same way

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<sup>6</sup> <https://www.snowdonia-society.org.uk/eu-referendum/>

we have seen happen on climate. The RSPB, WWF and WEL recently published a joint report on this<sup>7</sup>.

There are clear opportunities for alignment of this work with the existing challenge of developing meaningful biodiversity measures as part of the suite of Indicators under the Wellbeing of Future Generations Act.

## **6. Post-legislative scrutiny of Environment (Wales) Act 2016**

The Environment (Wales) Act sets out a direction of travel on the environment, identifying principles and specifying some mechanisms. Natural Resources Wales has important roles in many parts of this, so post-legislative scrutiny should address how NRW can be helped to become the organisation which Wales needs. It is an organisation full of skilled, experienced and committed people, so something must be amiss in its remit, structure or priorities to explain the gaps which are evident.

The scope for such scrutiny includes the statutory purpose of Natural Resources Wales. Is the purpose itself 'fit for purpose'? Does it provide the right foundation for the actions required to deliver key policies and strategies, for example the Nature Recovery Action Plan?<sup>8</sup>

Are the right elements in place for NRW to provide the leadership required to urgently deliver large scale nature recovery? What capacity and resources are needed, and are the priorities for action identified and understood at all levels?

We should all be concerned when NRW cannot assess the current condition or status of half of the nation's protected nature features; persistent failures of prioritisation and resourcing seem the most realistic explanation for the issues brought to light by NRW's Baseline Assessment.<sup>9</sup>

## **7. Understanding divergence: environmental monitoring and reporting**

The legislative bases for environmental monitoring and reporting were diverging before Brexit. Brexit has accelerated some of the divergence across and between the constituent nations of the UK, whilst slowing, or perhaps confusing, change in other areas.

What are the pros and cons of the different approaches in the UK, and how will we know what is working and what isn't? How will Wales, as part of the UK, report<sup>10</sup> coherently and consistently on international commitments?

JNCC advises the UK government and devolved administrations on UK-wide and international nature conservation. It seems likely that Welsh Government, NRW and JNCC will need to work intensively to align the work of the four constituents of the UK to mutual

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<sup>7</sup> [https://waleslink.org/wp-content/uploads/2021/06/Report\\_-\\_Nature-Recovery-June-2021.pdf](https://waleslink.org/wp-content/uploads/2021/06/Report_-_Nature-Recovery-June-2021.pdf)

<sup>8</sup> <https://gov.wales/nature-recovery-action-plan>

<sup>9</sup> <https://www.snowdonia-society.org.uk/data-deficient-the-fate-of-nature-in-wales/>

<sup>10</sup> <https://jncc.gov.uk/our-work/international-reporting/>

benefit and meet international commitments. It is important to ask these questions now so that Wales plans effectively for current and future evidence and assessment needs within our nation and beyond.

## **8. Training and education needs of an environment-focused nation**

We would urge the sixth Senedd to pay attention to the scope and scale of the training needs required to realise the potential for Wales to deliver on nature, climate and environment.

The scale of some of Welsh Government's ambitions are to be admired and applauded. To deliver fully on the ambition will require no less than a revolution in our collective understanding of our natural resources, their management and how the diverse sectors and individuals within them contribute to the big picture.

In previous submissions<sup>11</sup> we have highlighted how it will, for example, take great skill and dedication to devise, run, monitor and review the Sustainable Farming Scheme, an outcomes-focused land and water management scheme within a public goods framework.

People with the skills needed are going to be in very short supply. Long-established silo thinking will need to be replaced as people become more experienced and confident in working in new ways. Those people will need to be flexible enough to make the leap from administering, enforcing or following prescriptions to enabling outcomes through adaptive and collaborative management. This is a major exercise in changing ways of thinking alongside ways of working.

This represents a major challenge for schools, colleges, universities, conservation bodies, farming and land-user organisations – and of course various arms of government. We will have to work together to rethink training needs and programmes, key messages and the language used to describe what we do, how we do it and why. None of this can happen overnight. Some of it must start immediately.

## **9. Waste and litter**

Action on waste has been a high-profile issue for Welsh Government. Recycling is perhaps the most visible element, and Welsh Government rightly proclaims the significant progress made and Wales' high standing in the international league tables.

Wales now has the opportunity to take this further, but the next steps require real courage. We believe the sixth Senedd should ask Welsh Government to come clean with the people of Wales. Welsh Government should tell us what really happens to the cans, card, paper, bottles and plastic we put out on the kerb. Where does it end up? We want to know. Only when that information is in the public domain will we be able to move beyond the recycling

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<sup>11</sup> <https://www.snowdonia-society.org.uk/wp-content/uploads/2019/11/Cymdeithas-Eryri-response-Sustainable-Farming-and-Our-Land-final.pdf>

league tables to recycling that actually benefits the environment, locally and globally. We need to see courage, honesty and leadership.

## **10. Working Together – a National Nature Service**

Effective management of natural resources should lead to protection of the environment. This is difficult work and there are no easy answers. It is also a collective effort. There has been cause for optimism amongst the usual bad news.

The First Minister's decision on the M4 was a milestone, a moment when the environmental movement was stopped in its tracks by a decision rooted in a vision of the future that made sense to us.

The Senedd debate on the 30<sup>th</sup> June this year, with the declaration of a nature emergency and commitments on statutory targets for nature recovery and closing the environmental governance gap was a special day. We saw informed and impassioned debate on a new level, combined with clarity on the next steps.

Outside Cardiff, consequences of the pandemic have seen organisations working in new ways, taking partnerships to new levels, thinking and discussing more openly than ever before, having the courage to co-operate. Here in Snowdonia we've been proud to play a key role in CaruEryri/Care for Snowdonia, a ground-breaking partnership pooling resources and ways of working between the National Park Authority, ourselves, the National Trust and the Outdoor Partnership. Together we have delivered a programme that has recruited and trained volunteers on an unprecedented scale, and delivered help to local communities and visitors alike, whilst protecting the most pressured and popular places.

The elements of volunteering, training, work placements and paid work for young people, combined with the challenges of the climate and biodiversity emergencies, have raised the concept of a National Nature Service up the agenda. This could be a chance for Wales to lead on practical solutions to complex problems across traditional sectoral boundaries.

We urge the Senedd to dedicate time to investigating how a National Nature Service for Wales might be designed, tested and supported, and what role Welsh Government might play.

## **11. Matching actions to words**

'The end of the road for Welsh Government?' is the title of a piece in the forthcoming Snowdonia Society magazine. A piece written in praise of Welsh Government's courage in announcing a moratorium on new roads<sup>12</sup>, announced by the Deputy Minister for Climate Change. This is welcomed as a chance to reset thinking on the cost-benefit analysis of new roads in the light of the climate and biodiversity emergencies. A courageous step, widely appreciated across the environment sector.

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<sup>12</sup> <https://gov.wales/freeze-new-roads-projects-be-announced>

Yesterday we learnt from the Deputy Minister for Climate Change that assessment of the Llanbedr bypass is being 'fast-tracked'<sup>13</sup> because of the risk of losing EU money. The Llanbedr scheme – a new road in a National Park - is classified as 'Low Value for Money' in the Government's own strategic roads assessment. The scheme has no WelTAG Stage 3 business case – which Welsh Government's rules stipulate must be in place before a decision to proceed or not can be made.

Whatever 'fast-track' process is used it must not mean taking shortcuts to get the tarmac and concrete in place. The merits of the road itself are not the question here. This is about commitment, consistency and matching the actions to the words.

Review of WelTAG is a key part of the approach needed. The current WelTAG is based on the original UK Department for Transport model which prioritises the reduction of delays and congestion by algorithm – an old-fashioned 'predict & provide' model which leads in a straight line to new roads. A new WelTAG, in line with current Welsh Government policy and direction of travel, should instead be based upon carbon accounting. This will lead to different decisions.

Finally, we want to be able to have faith in our government. The environment is what we work for, what we live for. Trust is the currency of leadership, and Wales needs leadership on the environment. The sixth Senedd needs a laser focus on matching the action to the words.

Thank you once again for the opportunity to submit our views.

John Harold

Director, Cymdeithas Eryri



Peatland restoration – Cymdeithas Eryri volunteers and partners working together for a brighter future

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<sup>13</sup> <https://www.dailypost.co.uk/news/north-wales-news/north-wales-bypass-decision-fast-21519660>