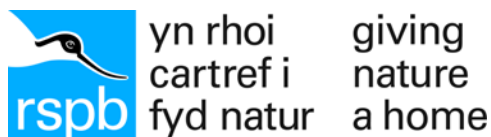


Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Blaenoriaethau ar gyfer y Chweched Senedd / Priorities for the Sixth Senedd
PR80
Ymateb gan RSPB Cymru / Evidence from RSPB Cymru



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

10 September 2021

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

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

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

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

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

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

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

Legislation on environmental governance, principles and nature recovery targets

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

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

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

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

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

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

Green recovery

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

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

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

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

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

[The importance of robust planning for decarbonisation in harmony with nature](#)

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

Strategic spatial planning is essential to:

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

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

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

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

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

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

Investment in nature delivery

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

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

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

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

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

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

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

Work with other Committees

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

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

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

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