



Wildlife Trusts Wales (WTW) would like to thank the Climate Change Environment and Infrastructure Committee for the opportunity to comment on the priorities of your Committee for the Sixth Senedd 2021-2026. WTW strongly supports the submission by Wales Environment Link and agrees with areas of priorities raised. In addition, we have several other issues we would like to also raise with the Committee.

1. Nature Based Solutions

The Committee could ask how Welsh Government is investing in and prioritising the establishment of Nature-based Solutions (NbS) to assist both people and nature to adapt to our changing climate. NbS are defined by the IUCN as “actions to protect, sustainably manage and restore natural or modified ecosystems”. Such solutions can be used to tackle socio-environmental challenges such as climate change, water security, water pollution, food security, human health and biodiversity loss. We believe that NbS have a critical role to play in addressing the Climate and Nature Crisis in Wales. We believe this is a vital area for your Committee to explore further in order that the full benefits of such an approach are fully realised and implemented across Wales.

2. NRW scrutiny

Given the deepening Climate and Nature Crisis, we believe the time has come to rigorously assess the ability of NRW to carry out its regulatory functions. We note that the Minister for Climate Change, Julie James MS has confirmed that the Welsh Government is undertaking a “review of where regulatory bodies sit together – Welsh Government, Natural Resources Wales, local authorities and various other statutory bodies.”

One area that continues to give cause for concern is the incredibly small proportion of prosecutions for water pollution incidents in Wales by NRW. Given the large number of agricultural pollution incidents that occur on an annual basis, there have been just two prosecutions relating to agricultural pollution in Welsh rivers by NRW from 2017-2019. This is an alarming situation. The new Agricultural Pollution Regulations will need to be backed up by meaningful enforcement by NRW. At the moment, this is simply not happening.

Wildlife Trusts Wales strongly supports the Welsh Government’s intention to “introduce legally binding requirements to reverse biodiversity loss through statutory targets.” A key question is what will be the role of NRW in ensuring that any agreed statutory targets are met, and are they currently equipped to take on this role?

3. River Pollution

A report from Natural Resources Wales in January 2021 worryingly stated that over 60% of rivers afforded the highest protection in Wales exceeded their phosphate targets¹. These rivers support some of Wales most iconic wildlife, including Atlantic salmon, freshwater pearl mussel, white-clawed crayfish and floating water- plantain. There are nine rivers in Wales that have Special Area of Conservation status – Cleddau, Eden, Gwyrfai, Teifi, Tywi, Glaslyn, Dee, Usk and Wye. The river with the highest level of phosphate failures was the Usk, with 88% of its water bodies failing their target. The Wye, Cleddau, Teifi and parts of the Dee also failed their phosphate targets. Phosphate is known to cause significant ecological damage in river systems leading to the eutrophication of rivers. Land management practices such as farming contributed to phosphate loadings in rivers through run-off. In addition, 66% of river water bodies failed to achieve good ecological status under the Water Framework Direct (WFD) classification, with diffuse agricultural pollution being one of the key contributing factors.

Given the shocking state of many rivers in Wales, it is unclear to us which Committee will consider and discuss river pollution. Will this be considered by this Committee due to environmental pollution concerns, or will it be discussed in the Economy, Trade and Rural Affairs Committee? This is an issue that continues to receive a lot of media and public attention, and rightly so, given the ongoing unacceptable pollution of Welsh rivers.

4. Pesticides

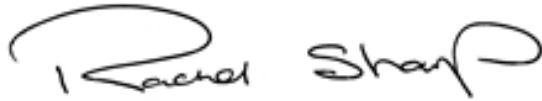
We believe that the issue of pesticides and their domestic use and also the use of these chemicals by public bodies across Wales needs to be investigated and addressed. The severe decline in insects and in particular, pollinators has been linked to pesticide use and has received widespread national and international coverage. Whilst the use of agricultural pesticides has received a lot of attention, there is evidence emerging of the application of pesticides in gardens and the impact this can also have on insects and pollinators. The extremely serious problem of insect decline is, therefore, not just an issue concerning the use of pesticides in agriculture. Indeed, recent research indicates that pollinators can benefit from foraging in domestic gardens less contaminated by pesticides than in adjacent croplands. Therefore, we believe that this is a matter for your Committee to investigate further.

5. CBD COP and 30x30

In 2022 the intention is to still hold the Convention on Biological Diversity COP. Many countries have already made various commitments of restoring 30% of land and sea for nature by 2030. WTW believe the Welsh Government needs to make a similar commitment but a meaningful one that requires active management and restoration and not to mistakenly think that protected landscapes should count towards these targets. The land in our National Parks and AONB's is predominantly privately owned and isn't managed for nature, and therefore, their inclusion would be a greenwash of the issue. Likewise, the MPA network isn't managed as a whole site; instead, only site features are protected. There is increasing recognition internationally of the global nature crisis and the need for urgent action to address this. We believe it is vital that the Welsh Government formally adopts the 30x30 target.

Wildlife Trust Wales can provide a full briefing on the issues raised above if Committee members would welcome further details.

Rachel Sharp
Chief Executive Officer
Wildlife Trust Wales

A handwritten signature in black ink that reads "Rachel Sharp". The signature is written in a cursive style with a large, looping initial "R" and a distinct "P" at the end.