

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

PR81

Ymateb gan Y Gymdeithas Cadwraeth Forol / Evidence from Marine Conservation Society



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The Marine Conservation Society (MCS) welcomes the opportunity to feedback to the Climate Change, Environment and Infrastructure Committee (hereafter “the Committee”) on priorities for the Sixth Senedd term (2021-2026).

MCS is the UK’s leading marine conservation charity. We work to ensure our seas are healthy, pollution-free and protected. Our vision is for seas full of life where nature flourishes and people thrive. We have actively been working in Wales to improve the health of Welsh seas for the past 30 years.

Summary of recommendations for the next 12-18 months

Marine Energy:

- **Investigate how marine development can occur without causing irreversible environmental damage**

Net Zero:

- **Explore the design, implementation and funding of a National Blue Carbon Recovery Plan**

Nature and Biodiversity:

- **Scrutinise the designation and management of Wales’ Marine Conservation Zone process**
- **Co-inspect the UK Joint Fisheries Statement and Fisheries Management Plans alongside the Rural Affairs Committee once available**

Circular Economy:

- **Hold Welsh Government to account on timelines and implementation of an all-inclusive Deposit Return Scheme and Single-Use Plastic bans**
- **Ensure full alignment with EU REACH regulations, including restrictions on intentionally added microplastics, PFAS in non-essential uses and other harmful contaminants**

Tackling Climate Change in harmony with nature: Marine Spatial Planning

“Effective marine planning for, and regulation of, new development is crucial to enabling sustainable marine sector growth, particularly for the development of marine energy projects to contribute to net zero.” - Minister for Climate Change on the Welsh Government priorities, July 2021

We welcome the Welsh Government’s ambition to deliver renewable energy to the equivalent of 70% of Welsh homes by 2030. We note the ambition for the growth of marine renewable energy to meet these commitments. Whilst it is true that marine renewable energy will have a key role to play

in the move away from Wales's dependency on fossil fuels, development of this type of energy is not without its challenges - particularly, avoiding destruction and disturbance to marine life and the habitats on which they depend. We cannot allow the need for marine renewable energy to exacerbate the nature emergency we are experiencing in Wales.

We recommend that the Committee considers investigating how the ambition for marine renewable energy in Wales can be realised without causing irreversible damage to Marine Protected Areas.

Tackling Climate Change in harmony with nature: Blue Carbon

"... we also need to understand what the seas already deliver for us in terms of carbon sequestration and to enhance that where we can, and to stop degrading it in ways which are utterly unnecessary." - Minister for Climate Change, MCS Sensational Seas Event, June 2021

It is encouraging that the Minister recognises the importance of our blue carbon habitats in sequestering carbon. In order to meet the ambitious target to becoming carbon net-zero by 2050, it is critical we look towards the ocean and its immense carbon storing capabilities. An NRW-commissioned report in 2020 revealed that blue carbon habitat in the Welsh National Marine Plan area presently stores at least 10 years' worth of Wales' carbon emissions. Not only do these habitats act as effective carbon stores, but equally are efficient at absorbing storm energy; thus, acting as a natural flooding solution.

We recommend the Committee explore the development, implementation and funding of a National Blue Carbon Recovery Plan designed to maintain and enhance our invaluable marine blue carbon habitats.

Restoration and protection of one of Wales's most important natural assets – the marine environment

"Our vision for our seas is that they are clean, healthy, safe, productive, and biologically diverse. Wales has important marine habitats, such as seagrass forests and saltmarshes. Our approach is structured around assessment, protection and management, and restoration." - Minister for Climate Change on the Welsh Government priorities, July 2021

We welcome the Minister's continued commitment to seas that are "clean, healthy, safe, productive and biologically diverse" (a commitment made by all four UK nations within the UK Marine Policy Statement, 2011). Given that the Minister does not elaborate on priorities here, we thought it would be useful to set out our priorities for the Committee:

We recommend that the Committee scrutinises the identification, designation and management of the Marine Conservation Zones process in Wales over the next 12 months. The process of identifying sites is already severely delayed in Wales.

The Committee should work with the Rural Affairs Committee to consider scrutinising the UK Joint Fisheries Statement and the Fisheries Management Plans once these are made available.

Moving towards a Circular Economy – introducing waste reduction legislation

“The government has committed to bringing forward legislation to ban more single use plastics however the implications the Internal Market Act 2020 might have on these proposals is not yet clear.” - Minister for Climate Change on the Welsh Government priorities, July 2021

The introduction of key legislation such as an all-inclusive Deposit Return System (DRS) and bans on single use plastic items has been significantly delayed for a number of years. While we appreciate the complications that might be posed by the Internal Markets Act, Wales cannot afford to delay further in the face of a Climate and Nature Emergency.

“Maintaining and enhancing our dynamic water ecosystem is central to tackling the wider strategic challenges we face. We need to ensure our drainage and sewerage systems are sustainable, managed effectively and that they are fit for purpose in terms of meeting changing demands.” - Minister for Climate Change on the Welsh Government priorities, July 2021

We welcome the Minister’s recognition that effective management of drainage and sewage systems is fundamental in protecting our water ecosystems – both freshwater and marine. To ensure that drainage and sewage systems are “sustainable”, contaminants must be prevented from entering wastewater systems at source. For additional information, please see our recently published [sewage sludge paper](#).

Additionally, a clean and safe circular economy must be free from harmful chemicals such as PFAS. As [summarised by the UK Government](#); “PFAS are a group of over 9,000 different chemicals, some of which are already banned or highly restricted. In industry, these substances are used as stain repellents, coatings and fire-fighting foams. The chemicals in PFAS are extremely persistent in the environment; the substances can accumulate in animals and can also be toxic this means PFAS are of growing concern for both human health and environmental reasons.” A truly circular economy cannot be achieved while chemicals such as PFAS continue to accumulate in our environment.

We recommend that the Committee holds Welsh Government to account on timescales for the introduction of much-delayed and much-needed legislation on an all-inclusive Deposit Return System and bans on single use plastic.

The Committee should work with Welsh Government to keep fully aligned with EU REACH regulations, including restrictions on both intentionally added microplastics and PFAS in non-essential uses amongst other harmful contaminants.

Thank you again for the opportunity to provide the above comments. If you have any further questions with regards to our feedback above, please do not hesitate to contact me.

Yours sincerely,

C. Trotman

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Marine Conservation Society