

**HRLN 13 - Evidence from: RSPB Cymru, Annie Smith, Head of Nature Policy & Casework, RSPB Cymru**

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Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee

Atal a gwrthdroi colli natur erbyn 2030 | Halting and reversing the loss of nature by 2030

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**1. Your views on the effectiveness of current policies / funds / statutory duties in halting and reversing the loss of nature by 2030.**

(We would be grateful if you could keep your answer to around 500 words).

Wales' positive policies and strong government commitment to nature recovery are not always backed with adequate resources and capacity, so that progress is not being made at a pace commensurate with the nature emergency. We have long [argued](#) for statutory biodiversity targets to drive action, resources and mainstreaming across government and across sectors and have warmly welcomed the commitment to the Environmental Principles and Biodiversity Bill, which we comment on under question 5.

The framework for the sustainable management of natural resources in the Environment (Wales) Act (EWA) is not currently focused on biodiversity restoration/recovery, and we suggest the SMNR objective should be updated to reflect this need (along with the related objective in the Agriculture (Wales) Act), in line with the promised new statutory biodiversity targets. The integrated approach intended through the EWA has not, so far, been achieved to full effect – for example in our experience, NRW's approach to forestry, flood risk management and nature can still be siloed. The 'section 7 list' of priority species and habitats has still not been published.

Protected sites are another example where policy ambition far outstrips implementation; RSPB Cymru has raised a concern with the IEPAW on this matter. They are recognised as a key tool for nature's recovery in domestic and global policy but condition assessments for both [terrestrial](#) and marine [marine](#) sites make for grim reading. The statutory duties could be improved upon, but the main issue is that all aspects of delivery (designation, protection, monitoring, management, regulation and enforcement) are under-resourced. WEL's report

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[Pathways to 2030](#) estimates that an additional £70 million per year is needed for protected site monitoring, designation and management.

The transition from Glastir to the Habitats Wales Scheme has meant a reduction in funding available for SSSI management. NRW's budget for Land Management (section 16) Agreements has also been cut with the result that many multi-annual agreements have not been renewed. The announcement that the Sustainable Farming Scheme (SFS) will pay for SSSI management is extremely welcome but will of course depend on sufficient funding of the SFS. It is important to note that this will not provide the solution for all sites, as not all are farmed. Protected tern colonies that depend on wardening to survive are an example.

We welcome the reinstatement of the large grants (up to £1m) element of the Nature Networks Fund (NNF) and note it is likely, again, to be heavily over-subscribed. It would be helpful if the NNF was able to utilise underspend from other departments to maximise potential delivery. Other grants, such as the new NLHF Landscape Connections, can fund multi-year high value projects but are highly competitive UK wide programmes. The loss of access to EU LIFE funding, which supports a number of multi-million pound restoration projects in Wales that are now coming to an end, leaves a critical gap and a funding cliff for species such as Curlew. Better integration across the UK Levelling Up and Shared Prosperity Funds could provide an opportunity for green infrastructure and jobs for nature and climate.

A short-term, project-based approach is not suitable for funding ongoing and systemic management and protection needs, such as Island Biosecurity. In recent years this has been delivered by RSPB Cymru and partners via funded projects, but this is not sustainable. As an essential part of the statutorily required protection of often internationally important seabird breeding sites it needs to be embedded in Welsh Government/NRW delivery, aligned to the forthcoming Wales Seabird Conservation Strategy.

## **2. Your views on the progress towards implementing the Biodiversity Deep Dive recommendations.**

(We would be grateful if you could keep your answer to around 500 words).

RSPB Cymru is a member of the BDD Core Group. We welcomed the Welsh Government's commitment to delivering the recommendations agreed in October 2022 and the current Cabinet Secretary's endorsement and progress update in his written statement of 25 July.

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The purpose of the BDD was to explore how Wales can meet the global '30 by 30' target to protect and effectively manage 30% of land and sea by 2030, through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation measures ('OECMs').

To give an idea of the step change for biodiversity this demands: Around 11% of Wales' land and freshwater area is covered by a nature conservation designation, but as noted above, protection, monitoring and management of these sites is already inadequate. While Marine Protected Areas do currently cover a greater area than 30% of Welsh seas, NRW's assessment that less than half of the site features are in favourable condition again indicates the challenge in securing appropriate management.

[Recommendation](#) 1 of the BDD is to transform the protected site series so that it is better, bigger and more effectively connected. Many of the details under this headline reflect pre-existing commitments or statutory responsibilities that have faced significant delays in their implementation, including designation and completion of the network on land and at sea, management and monitoring. While the stricter protection afforded to SSSIs through the recent review of PPW is welcome, progress in other areas has been limited. NRW has begun to scope its review of the SSSI series to inform an accelerated notification programme, and we are urging them to ensure the review itself is a swift exercise that can lead quickly to implementation. We understand that publication is imminent of the long-delayed Phase 2 assessment of the Special Protection Areas required for the UK to meet its legal duties, and this must be taken into account in NRW's review. It is critical that Welsh Government swiftly progresses work to complete the SPA network and that NRW is resourced to enable both designation and positive management.

Thinking is still developing about what 'OECMS' might look like in Wales, but it is likely that some of the best opportunities will come from large scale catchment management and restoration of carbon rich habitats like peatland, which could also provide opportunities in environmental markets like carbon credits. To contribute to the target, they will have to be under effective management (and de facto protection) for the long term.

Substantial work has been done by expert working groups to build understanding and make recommendations, focusing on OECMs, Monitoring and Designated Landscapes; the next step is to identify priority actions to take forward. We are also advocating the need to set out more of a roadmap to achieving this target, looking at what milestones need to be delivered, by when. For example, by 2030 we want to see management plans in place and being delivered for all sites, and

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all should have a baseline condition assessment so that regular monitoring is able to track the impact of this management on site condition.

### **3. Your views on current arrangements for monitoring biodiversity.**

(We would be grateful if you could keep your answer to around 500 words).

There is no doubt that a substantial increase in monitoring will be needed to track Wales' delivery against statutory biodiversity targets.

As mentioned above, monitoring of designated sites is currently critically under-resourced. This is indicated by NRW's 2020 Baseline Assessment, where insufficient staff resource is repeatedly noted as a reason for 'unknown' feature condition.

The 30by30 target requires an uplift in this monitoring capacity, as recognised by the Monitoring Expert Group under the BDD. As well as protected area condition, measuring against 30by30 will require monitoring of the area of land and sea that can be counted towards the target, as well as the effectiveness of management of protected areas and OECMs, their connectedness and their governance.

The Deep Dive Monitoring Expert Group underlined the importance of collaboration between organisations that collect data, and this is something we are discussing with NRW. We would stress though that greater collaboration will not, on its own, bridge the resourcing gap. In addition to data gathering, its management and interpretation is key (e.g. using data to undertake formal protected site condition assessments).

The State of Nature partnership presents metrics on the state of nature including species abundance, distribution and extinction risk. These metrics are prepared using data collected by thousands of people, most of whom are volunteers, largely through structured and supported regular monitoring programmes such as the [BTO/JNCC/RSPB Breeding Bird Survey](#). Biodiversity data used in the State of Nature reports (in which NRW is a partner) are also presented in the SoNaRR.

The State of Nature 2023 Wales report presented, for the first time, a multi-taxa species abundance indicator for Wales, which showed an average 20% decline across Wales since 1994. We hope this indicator may be further developed by incorporating additional datasets. Metrics like this show average trends and help us understand the overall picture for nature, and therefore have a key role to play in relation to Wales' forthcoming statutory targets framework. They can also be

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looked at for different groups of species and habitat types (e.g. birds associated with farmland) to build a more detailed picture and inform decisions as to how we should respond.

#### **4. Your views on new approaches needed to halt and reverse the loss of nature by 2030.**

(We would be grateful if you could keep your answer to around 500 words).

With around 90% of Wales being farmed, the SFS has a transformational role to play in nature recovery. The scheme must take full account of targets on species recovery, ecosystem restoration and protected areas. IWA recently published a [blog](#) by RSPB Cymru on the inter-dependence of these two policy areas, arguing that: -

To boost common species (increasing overall species abundance) and provide the foundation for nature's recovery the SFS must support farmers across Wales to manage a minimum of 10% of their enclosed land as the right [mix](#) of habitats which traditional family farms would have once provided.

To stop the extinction and support recovery of threatened species such as Curlew, the SFS must incentivise long-term, collaborative working across farms. The Welsh Government should be supporting pilot projects now, so we can learn how to do this well.

Delivering the 30 by 30 target will depend on the SFS rewarding farmers for managing their SSSI land in accordance with management plans and supporting collaborations for landscape scale restoration and management (which could be identified as potential OECMs).

We welcome the Welsh Government's commitment to developing principles for sustainable finance and note the NGO sector has experience to draw on. For example, the RSPB is working with Finance Earth to develop a 'gold standard' carbon finance model, initially focused on the peatland code, which relies on blending public grants and private finance. Independently verified, voluntary carbon markets provide opportunities to restore nature as well as contributing to climate change mitigation and adaptation, and securing benefits to land owners and communities. The MARINE Fund Cymru is also an exciting development.

We also advocate further development of the approach in Wales to 'biodiversity net benefit' through development, through introduction of a statutory

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requirement; we are concerned that the current policy-based approach in PPW is difficult for planning authorities to implement and enforce. The strengthening of protection for SSSIs through PPW is welcome, and we note there is further potential to support nature recovery through planning, e.g. through Policy 9 of Future Wales, although the promised Gwent Levels [pilot](#) is still at an early stage.

Wales is home to internationally important seabird populations but many species are in crisis, with Highly Pathogenic Avian Influenza having taken a heavy toll, compounding existing threats. We are supporting Welsh Government to develop a Seabird Conservation Strategy to ensure adequate protection, monitoring and management of our seabird colonies. A more strategic, spatial approach to marine planning to ensure that the cumulative impacts of marine development proposals can be understood and managed; secure long-term funding for island biosecurity; completion of the Marine Protected Area network, and the roll-out of Remote Electronic Monitoring on fishing vessels would help to ensure the protection and recovery of our globally important marine wildlife.

The RSPB is calling for a ban on lead ammunition in the UK, a known risk to birds and human health for more than half a century. Following a public consultation exercise and advice from HSE and the Environment Agency, we expect the UK Government to determine this issue, in consultation with the Welsh and Scottish Governments, in the near future. Each year, thousands of tonnes of lead bullets and shotgun pellets are dispersed into the environment, causing an unacceptable toll on wildlife. We are urging the Welsh Government to press for a ban, as already instituted in Denmark and several German Länder. Alternatives to lead ammunition are now widely available in the UK.

## **5. Do you have any other points you wish to raise within the scope of this inquiry?**

(We would be grateful if you could keep your answer to around 500 words).

RSPB Cymru has long advocated that, in order to ensure that Wales' commitment to the Global Biodiversity Framework (GBF) has real traction to drive change, a legal framework of nature recovery targets is needed. We have welcomed the Welsh Government's commitment – stemming back to the Senedd declaration of the nature emergency - to the Environmental Principles and Biodiversity Bill. The Bill must be clear on the urgency of ambitious action to reverse biodiversity loss. A robust, independent approach to environmental governance is essential to help

keep Wales on track to meet biodiversity targets, but also to uphold compliance with environmental law and improve its effectiveness.

We are concerned that the Welsh Government's policy response to the White Paper consultation signals that it may back away from the proposed headline target (to reverse the decline in biodiversity with an improvement in the status of species and ecosystems by 2030 and their clear recovery by 2050) and instead include a 'nature positive purpose, or mission statement' on the face of the Bill. This looks like a cooling of ambition, and would be a missed opportunity.

Although the Bill will still require Ministers to establish and report on legally binding biodiversity targets via secondary legislation, we fear dropping the headline target, with its key 2030 and 2050 dates, which align with the GBF, risks undermining the pace of delivery. The Welsh Government has always made clear that targets are not to be set for their own sake, but to drive action.

Because of the timing of the Bill, the first steps to implement it will be taken in the next Senedd term. This will include setting the first Supporting Targets in secondary legislation to get Wales' efforts at delivering nature recovery on track. The Bill is the only chance the current Senedd has to set timeframes that make clear the urgency of stepping up action to deliver change – by the beginning of the next decade we want the prospects for biodiversity to be demonstrably better than they are now. We are committed to continuing to work with the Welsh Government to ensure the Bill is robust and ambitious.

RSPB Cymru also wishes to register its deep concern regarding the change process recently launched by NRW. As we have set out in our evidence, nature conservation delivery is already critically under-resourced. WEL's Pathways to 2030 report, identifying investment needed in key actions for nature recovery, repeatedly points to the need for an increase in people to deliver on statutory functions and programmes. The further loss of capacity in relation to specialist ecological advice, and the monitoring and management of protected areas risks undermining the legacy of flagship programmes like Natur am Byth, our delivery of '30 by 30' and ultimately Wales' ability to reverse biodiversity loss and restore the benefits it provides to all people.

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