

## **HRLN 23 - Evidence from: WWF 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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## WWF Cymru

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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.**

The Welsh Government has been keen to develop policies and legislation which put nature at the centre of decision making. Yet despite these advances, the policies developed have tended to be less effective in practice. This is a matter of deep concern given that halting and reversing the loss of nature by 2030 is a critical deadline for addressing the nature crisis.

A notable example has been the policy architecture provided by the Environment (Wales) Act 2016 (EWA). From a climate perspective it was successful in producing a series of carbon budgets which set timebound targets for greenhouse gas emission reductions across most sectors (a notable exception being agriculture in the latest plan which should be corrected in the next). Yet from a nature perspective (covered by Part 2 of the Act) the ambitions were ‘fuzzier’ and more closely aligned to the Well-being of Future Generations (Wales) Act 2015’s approach of setting open ended, and often ill-defined, objectives which delivery bodies have been struggling with ever since.

In this regard the EWA created a series of reports that include the Natural Resources Policy (NRP) produced by Welsh Government, and Area Statements managed by NRW. These have shown themselves to be highly frustrating, and largely ineffective documents. Indeed, the NRP has proven to have so little material impact that the decision of Welsh Government to not fulfil its legislative obligation to update it following the last Senedd election has passed with only limited criticism. There are multiple reasons for this, but principle among them is that the wording and content of the NRP is vague and noncommittal to the point where most actions or inactions can be retroactively justified by its contents.

The Welsh Government has an opportunity to reconsider and strengthen EWA through the proposed Environmental Governance & Biodiversity (Wales) Bill 2025 (EGoB). This could function to edit Part 2 of EWA to bring it into line with the contemporary requirements of the COP15 Global Biodiversity Framework. This should take the form of strengthening the face of Act to include ‘nature restoration’ as a step beyond ‘maintain and enhance’, and the institution of a series of timebound biodiversity targets that require cross-government action to deliver. This would have the effect of strengthening the Government’s nature framework to a more formal and deliverable ‘black letter’ approach to policy making instead of the aforementioned ‘fuzziness’.

A key area of focus in this regard must be freshwater pollution, which is directly relevant [to Target 7 of the GBF and requires Wales to “reduce pollution risks and the negative impact of pollution from all sources by 2030, to levels that are not harmful to biodiversity and ecosystem functions and services, considering cumulative effects.”](#) We expect to see a strong set of targets as a result of EGoB that will drive action to address pollution across government – with a special focus on actions within the Sustainable Farming Scheme given that agriculture is often the primary source of river pollution across Wales.

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

WWF was not invited to participate in the Biodiversity Deep Dive group but accepts the conclusions as a follow on to the declaration of a nature and climate emergency. It is notable that the emergency declaration arguably produced a greater basis for action under the Drakeford government than the EWA and resulting reporting, despite its legislative intent. This is worthy of Committee reflection when considering future policy and legislation formation as political will and prioritisation is likely to be the biggest driver of success or failure, and thereby underlines the need for clear and prescriptive legislative requirements that a government is unable to avoid through verbiage.

In response to the Deep Dive WWF funded and produced the [Pathways to 2030](#) report with Wales Environment Link colleagues. This report sets out numerous overlaps with the Deep Dive's recommendations but is more focused on what needs to be done by 2030 across the whole government and wider partners.

From a protected sites perspective, we are pleased to see that progress has been made because of the Deep Dive - via the Nature Networks Programme. Getting sites into a good condition is a core element of ecosystem resilience and must remain a central focus of government action through current and future support programmes.

Yet in Round 3 of the programme, Welsh Government cut funding by £3.37m (27%). This means that no larger bracket grants were awarded for delivery in this past year. The introduction of project development funding was a welcome part of Round 3; however, the expectation that these should be less than two years curtails ambition, with many meaningful projects lasting longer. In addition, capping participation to one application per organisation stunts ambition. In 2022, NLHF (who administer the fund) received 36 Expressions of Interest – totalling more than £30m – for the larger two-stage process alone. This is triple the total available budget under both the large and medium Nature Networks opportunities, and shows the level of demand, need and opportunity to deliver on an adequate scale.

In the marine environment, we are still waiting for new Marine Conservation Zones (MCZs), to address the shortfalls identified in the Welsh Marine Protected Area network, and thereby complete an ecologically coherent network. In an increasingly crowded sea, MCZs could offer refuge to rare species and help to protect essential blue carbon stores. We urge the designation process to progress at pace, and that new MCZs are accompanied by robust management.

A further recommendation (and committed to in the Programme for Government), was to “Establish a targeted scheme to support restoration of seagrass along our coastline”. As agreed at a Ministerial roundtable held in February, Seagrass Network Cymru (consisting of government, management agencies, NGOs, practitioners and business) developed a National Seagrass Action Plan (NSAP) and submitted it to the Cabinet Secretary in July. We urge Government to endorse and publish the NSAP and provide necessary resource to initiate its implementation to restore Welsh Seagrass.

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

The first point to make is that monitoring is a critical component of understanding and improving biodiversity across Welsh land and sea. Programmes like ERAMP and work undertaken by NRW are vital to securing monitoring action, so it remains a concern that NRW has never been adequately funded by Government to fulfil all its functions, and is currently going through a further cost cutting exercise which is highly likely to result in significant redundancies and resource reallocations away from key biodiversity services (often because NRW are focused on funding areas of work for which they are able to recover costs. Biodiversity services often do not fit well into this model).

It is also important to note that species-specific monitoring is often dependent on volunteer citizen science, in collaboration with eNGOs. Citizen science is not free and requires significant inputs of time and resources. A [2021 report by the Funding Centre](#), commissioned by Wales Environment Link, showed that eNGOs are mainly supported by public donations and attracts the least government funding across England and Wales. Following Brexit, the pandemic and drop in available funding eNGOs continue to struggle. If the monitoring of new biodiversity targets continues to depend on citizen science programmes, the Welsh Government needs to be aware of the costs of such programmes, the funding vulnerability of the eNGO sector, and be willing to pay for this monitoring.

While Welsh data in some areas is comparatively strong (such as soil condition), we continue to have significant data gaps in areas such as marine and freshwater ecosystems. Given the high public concern over issues such as river health it is concerning that a lack of data may cause us to miss issues or not sufficiently understand their source and impact.

As a result, we need more collaboration on monitoring between land managers, farmers, local government and NRW, with more support for Local Nature Partnerships that can enable closer working relationships. Area Statements could be utilised for this, so they become more active and an ongoing method of building relationships around nature.

For the marine context, NRW's State of Natural Resources Report 2020 explains that "in general, we have an incomplete understanding of some pressures due to the challenges in monitoring the marine environment and subsequently establishing a causal link between pressures and observed impacts. We need to better understand the temporal and spatial distribution and impact of activities and related pressures." Given the growing focus on our seas as a source of energy, food, recreation, and carbon storage, we need more resources to improve our monitoring and understanding.

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

In March 2023, Wales Environment Link launched the 'Pathways to 2030: 10 Key Areas for Investment in Nature's Recovery in Wales' report. It outlined ten areas in need of focus to meet (or at least get significantly closer to) our 2030 targets. It estimated costs for enabling restoration considering public engagement and access; farmland; coasts; seas; peatland; grassland; protected sites; rivers and wetlands; woodland; and species. It sets out actions that are divided between stopping activities damaging to nature; reducing adverse effects on nature; and starting positive actions for nature's recovery.

It's essential to remember that halting further damage is equally as important as starting to make positive interventions. Budgetary decisions aren't just about where money is spent, but where money is saved, and we can save both money and nature by not funding businesses, sectors or jobs that are overall damaging to nature or the climate, as well as reinvesting in sustainable jobs that restore biodiversity and counter climate change. We must address the drivers of decline as robustly as we try to manage the consequences. WWF joins wider Link members in inviting the Committee to consider the Pathways report as a fuller answer to this question.

To address the overwhelming budgetary need, Welsh Government needs to embrace innovative funding opportunities to leverage private sector capital that might otherwise be used to purchase land and change its use in ways which might exclude local communities. WWF, and other eNGOs have been working with Government over several years in an attempt to better define the principles of, and opportunities for private capital. An obvious future scheme for its use is the forthcoming Sustainable

Farming Scheme which is likely to have less than half the operating budget that has been calculated to be necessary to adequately manage and restore nature by the recently updated [Scale of Need report](#).

We would also highlight the work of Wildlife Trusts who recently secured a £38 million donation from Aviva to restore Britain's lost temperate rainforests. Aviva recognized the opportunity to restore this rare rainforest. Working with an organization like the Wildlife Trusts has ensured Aviva can achieve significant carbon sequestration through restoring endangered forest to offset their future emissions. This work suggests that Welsh Government needs to significantly upskill itself over Green Finance as there are undoubtedly opportunities to engage with businesses who want to invest in nature's recovery as it makes good business sense to do so.

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

### **Global Responsibility**

Wales has a requirement to be Globally Responsible under the Well-being of Future Generations (Wales) Act 2015. As such the actions we take in Wales should not result in biodiversity overseas being negatively impacted. Common forms of negative action include deforestation, often associated with the production of key imported commodities such as palm oil and soya as identified in a recent joint [report by WWF, RSPB and Size of Wales](#). As Wales develops future biodiversity targets under EGoB (to comply with the COP15 Global Biodiversity Framework) it is vital that actions to address Target 16 to "ensure that people are encouraged and enabled to make sustainable consumption choices" and to "reduce the global footprint of consumption in an equitable manner" are fully considered and integrated.

### **Sustainable Farming Scheme**

The Sustainable Farming Scheme is likely to become the most significant intervention point for combined nature and climate action for Welsh Government for years to come. Yet despite being co-produced by a range of farming and land-management stakeholders the proposals have faced significant criticism – in part motivated by miss-information spread through climate denial linked groups. As the Welsh Government continues to work with stakeholders to develop the final iteration of the scheme there remains a risk that the nature and climate actions contained therein continue to be under threat and may be removed – thereby jeopardising the long-term viability of Welsh agriculture [with climate change related extreme weather events already costing farmers tens of million each year](#).

In response the Committee should continue to engage with the scheme's development and pressure Government to be transparent, not only about the expected implication of proposals on nature and the rural economy, but also for an assessment on the implications of doing nothing or maintaining the status-quo of nature's decline and long-term losses in direct agricultural employment.