

Written Response to Senedd Stage 1 Report on the Environment (Wales) Bill

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Introduction

The current environmental consultation approach is ineffective in Wales. This is because it privileges institutional voices while excluding those with lived and embodied environmental knowledge. This is best evidenced by the oral witnesses called to the Stage 1 inquiry, all of whom represented statutory bodies or large organisations rather than the communities most affected by the legislation.

What Wales needs is not more regulation but more meaningful integration of community knowledge and co-creative governance within existing frameworks. Increased legislation gives more power to governing bodies such as Natural Resources Wales and Council Conservation Teams, which can inadvertently centralise decision-making within environmental science which marginalises local expertise. **Effective environmental care depends on combining scientific and community/embodied knowledge through collaborative, place-based practice rather than enforcing additional statutory controls.** As Tengö et al. (2014) argue, sustainability emerges when diverse knowledge systems operate as parallel and equal sources of evidence rather than within hierarchical governance models, a position reinforced by the IPBES (2019) Global Assessment, which calls for participatory, co-produced governance instead of top-down enforcement.

This report draws on anthropological fieldwork conducted through *CoastalTales*, an international research project involving UNESCO, the University of Wales Trinity Saint David, Trinity College Dublin, and Alaska and Arizona State Universities. The written evidence submitted by Gareth Thomas, Professor Louise Steel, and Professor Luci Attala (University of Wales Trinity Saint David and UNESCO-MOST BRIDGES) to the Stage 1 Report of the Senedd Environment and Climate Change Committee on the *Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill (2024)* is rooted in three years of ethnographic research with a wide range of coastal partners. Grounded in the field experience of *CoastalTales*, our submission argued that environmental governance in Wales must recognise the legitimacy of multiple knowledge systems, especially those informed by community heritage, lived experience, and ecological practice. **While the creation of new legislation may seem an obvious response, it risks reinforcing technocratic control rather than engaging with the relational and cultural dimensions that underpin genuine environmental care.**

Recognition of Diverse Knowledge Sources- areas of agreement

The Committee recognises our argument that environmental governance must draw on diverse forms of evidence. It explicitly cites our call to engage with “non-institutional knowledge holders” and to acknowledge “community and heritage-based evidence”

(Stage 1 Report, pp. 107–113). Both our submission and the Committee’s report emphasise that environmental decision-making should be participatory and transparent. The Committee’s recommendation for wide consultation before new regulations reflects our call for inclusive engagement, although our position extends beyond procedural participation toward genuine epistemic equality. The report also supports our view that institutional structures and limited capacity constrain the Bill’s implementation, agreeing that community involvement and local legitimacy are essential for achieving biodiversity targets. In addition, the Committee aligns with our emphasis on the need for environmental governance that responds to Wales’s distinctive social and ecological contexts, recognising that sustainability cannot be separated from its cultural and historical foundations.

Areas of Disagreement

The most significant divergence concerns the depth of inclusion. Our submission, informed by many years of ethnographic work, calls for the structural integration of community, heritage, and embodied knowledge within the evidentiary and policy frameworks of the Bill. The Committee, by contrast, limits its recommendations to improved consultation procedures. While both perspectives acknowledge the value of local knowledge, the Committee’s approach continues to assume that scientific and bureaucratic systems hold ultimate authority.

This approach is a form of **technocratic environmentalism**, which we identify as a key limitation of contemporary governance (Thomas 2025). It **privileges quantifiable metrics, compliance structures, and abstract targets over lived ecological relationships, treating sustainability as a technical problem to be managed** rather than as an ethical and communal practice of care. The Committee’s report does not challenge this framework; instead, it focuses on streamlining regulation and coordination, thereby reproducing what Thomas (2025) calls the “*managerial logic of environmental care*,” where control and compliance displace relational forms of stewardship.

We argue that **this model is fundamentally un-Welsh. In Wales, there exists a long-standing heritage of craft, land, and sea-based practices grounded in embodied and sustainable knowledge-traditions that, in some cases, reach back a thousand years or more. These forms of expertise, carried through generations, embody a moral economy of care that has sustained local ecologies. Yet they are being increasingly ignored** (or discontinued) in favour of technocratic systems that burden small-scale regenerative initiatives with bureaucratic complexity while granting larger, capitalised actors greater flexibility due to their institutional familiarity and access to legislative mechanisms. The Bill’s implementation risks perpetuating this imbalance if it fails to integrate plural knowledge systems and moral economies of care into its operational logic.

Our submission explicitly advances the principle of epistemic justice, understood as the fair recognition and inclusion of community knowledge within governance

structures. **Although the Committee reproduces our language, it does not propose mechanisms to embed this justice structurally. The difference lies in depth: while the report symbolically acknowledges community knowledge, it leaves it outside the formal evidentiary infrastructure of environmental decision-making.**

We also maintain that heritage is not peripheral but constitutive of environmental understanding. The Committee treats heritage contextually, acknowledging its social relevance but not its epistemic significance. In practice, this leaves **the Bill environmentally managerial rather than culturally regenerative and insufficiently respectful of Wales's ancient, place-based knowledge traditions.**

Co-production and Shared Authority

UNESCO's *CoastalTales* project has been working closely with Natural Resources Wales (NRW) through the Teifi Demonstrator Project, to submit a 10M bid to the National Lottery Heritage Fund. This collaboration demonstrates the value of co-production in developing inclusive, context-sensitive models of environmental governance. By bringing together scientists, policymakers, and community knowledge holders, the project illustrates how shared authority and knowledge integration can generate more sustainable, legitimate, and locally resonant approaches to biodiversity care. This is not easy work, but that does not mean it is not worth doing. Environmental organisations are losing the trust and support of ordinary people because communities are witnessing first-hand the consequences of a top-down, legislation-heavy approach. This system makes it far easier to regulate or restrict small-scale, local knowledge producers than to challenge the larger industrial or commercial forces that cause the greatest environmental harm. In this way, we lose our traditional environmental knowledge holders. It is time to confront these challenges directly and commit to doing the hard things that rebuild trust, empower local stewardship, and ground environmental care in the lived realities of Welsh traditional knowledge.

References

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