Cynulliad Cenedlaethol Cymru Y Pwyllgor Amgylchedd a Chynaliadwyedd NRW 2015 - 28 Cyfoeth Naturiol Cymru - Craffu Cyffredinol 2015 Ymateb gan Ivor Rees (Saesneg Yn Unig)

## Background

This is a personal response. I am a retired university lecturer in Marine Biology at Bangor University. Over very many years I collaborated with or advised staff at the predecessor agencies, NC, NCC, CCW and JNCC. This included working on several joint projects with them involving work at sea all round Wales and various impact studies on such as disposal to sea of sludge and dredge spoil, as well as fishery and aggregate dredging effects. I have also been involved with the identification and recommendation for safeguarding measures for sensitive biogenic habitat features such as the horse mussel reefs. Arising from this history of interest in conservation and marine resources I would like to make the following points:-

- 1. There seems to have been a disproportionate loss of the most experienced and ecologically aware staff on the biodiversity conservation side of NRW following the merger. There are now concerns that the organisation is lacking in the breadth of expertise in some areas to fully meet it's special role in advising government on biodiversity issues, safeguarding all aspects of wildlife in designated sites and adequately scrutinising the multiplicity of development projects that may significantly impinge on natural resources. After the degree of hollowing out that has happened it could take decades to re-build the previous capabilities. In the meantime there is a risk that the organisation may no longer be perceived as "fit for purpose" in respect of wildlife conservation. Seen from outside, the poorly managed changes appear to have created a low level of morale.
- 2. I have particular concerns that the staffing and financial support level may not be adequate to meet the challenges in the marine areas of responsibility. While renewable energy from the tides may in principle be a welcomed, the recent flurry of proposals will generate a huge amount of case work for the wildlife conservation side of NRW to scrutinise. There will be wider ramifications, such as the sourcing of material for barrier walls and needs to consider mitigation measures. This type of work requires a range of ecological understanding including marine biology, coastal geomorphology and sediment transport. There have been recent cases in designated sites where it has not been the finished development that has caused ecological damage but the short term way the contractors went about the works that caused the most ecological damage. For this reason staff need to be able to keep watching briefs and not merely rely on the EIAs produced by developers After several early retirements and some deaths in service, the capabilities for marine work need to be reviewed. This includes ensuring that teams can be mounted for scientific diving or operations on research vessels.

- 3. If the Silk Commission recommendation for Wales to take primary responsibility for the marine environment out to mid-lines are adopted there will be added requirements both for marine conservation expertise and seagoing capabilities. This will include needs to survey and monitor aspects of the ecosystems of the offshore Marine Conservation Zones. Several of these have been the subject of DEFRA / English Nature / JNCC consultations. Marine work inevitably demands a high level of resourcing, whether for diving or for survey in deeper water using multi-beam sonar and remote cameras from research vessels.
- 4. An annual event used to be organised by CCW Marine & Freshwater Section in the form of a Monitoring Workshop, that was until the money ran out. This was more than just a meeting to bring together the various survey contractors helping with the monitoring of features of the SACs as required under the Habitats Directive. In practice it became a very useful event where key NGOs, scientists from several universities and consultants could exchange information on the aquatic environments of Wales. Staff of the former EA were also involved in some of the projects under discussion, so a start had already been made to cross working in marine science even if consents were sometimes at cross purposes. Since Wales lacks a premier government funded marine lab equivalent to DAFS Aberdeen and SAMS Dunstaffnage in Scotland, a means of bringing together marine scientists from different organisations was best be done by CCW. This sort of event could usefully be revived by NRW.
- 5. The withdrawing of funding from various NGOs was not well handled by NRW management. Far too little thought was given to the knock on effects on those organisations. No consideration seems to have been given to the timing relative to plans already in hand by those organisations and there was intransigence when obvious adverse effects were made clear. Citizen science organised through the NGOs can make a considerable contribution to those parts of the NRW remit dependant on biodiversity information, but it does require some on-going funding to make the best use of volunteers. A prime example of this is the loss of funding by Botanical Society of Britain and Ireland for a Wales Officer. My impression is that while the naturalists who contribute so much to the understanding of the Welsh environment may still have a high opinion of the NRW scientific staff they still interact with, there has been a serious loss of confidence in the ability of the organisation at managerial level to meet the responsibilities for conserving wildlife resources.