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Y Pwyllgor Amgylchedd a Chynaliadwyedd
NRW 2015 – 72
Cyfoeth Naturiol Cymru – Craffu Cyffredinol 2015
Ymateb gan Cymdeithas Adaryddol Cymru (Saesneg Yn Unig)



Welsh Ornithological Society
Cymdeithas Adaryddol Cymru
www.birdsinwales.org.uk

Committee Clerk,
Environment and Sustainability Committee,
National Assembly for Wales,
Cardiff Bay,
CF99 1NA.

Dear Sir

Natural Resources Wales - Annual Scrutiny 2015

A response to The Environment and Sustainability Committee consultation from the Welsh Ornithological Society.

1. Background

The Welsh Ornithological Society (WOS) is a membership organisation that promotes the conservation of birds and their habitats across Wales. The Society encourages the study of wild birds and a high standard of bird recording in Wales through its publications, annual conference and grant scheme.

WOS is pleased to respond to this consultation. However we only received details of it very recently and therefore the following response is not as detailed as we would like. We would be happy to give further verbal evidence to the Committee if required.

2. NRW priorities

Whilst we recognise that the creation of NRW is complicated and will take time to settle down, we are very concerned about the lack of progress towards achieving biodiversity targets. The Society is concerned about the declines in the populations of many of Wales' birds and of the failure to meet the 2010 target to halt the decline of biodiversity – this was one of the drivers for the creation of NRW but there seems little progress on trying to meet the new 2020 target, which is now only 5 years away.

NRW's website makes little or no mention of wildlife or conservation and we can find no mention of the 2020 target or how NRW plans to work towards meeting this target.

3. Evidence-based decision-making

President: Iolo Williams

We agree strongly that NRW should be an evidence-based organisation. However, we are very concerned about the quality of evidence that is currently being used to make important decisions. Foremost of these is the granting of licences to shoot birds indigenous to Wales, such as cormorants, goosanders and even starling (a red listed species). The evidence that we have seen is very poor, makes no reference to the population of birds affected nor the supposed 'damage' the birds are causing.

We have seen no robust evidence that justifies the granting of licences and consider that, as it stands, such licensing may be unlawful. From discussions we have had with NRW about this matter, we understand that a Wales-wide survey of piscivorous birds is proposed (and hopefully has already started). Whilst we are pleased to see this happen and very much support NRW in doing this, we believe that there should be a moratorium on the issuing of further licences to cull these species until appropriate scientific evidence has been gathered.

4. Data-gathering

As an organisation that helps gather and disseminate information on Wales' birds, we are concerned that the NRW grant scheme specifically excludes survey and data-gathering. If NRW decision-making is to be evidence-based, it must ensure that it has the most up to date and accurate data available. The use of the voluntary groups in helping gather that information has a long and noble tradition in the UK and is a very cost-effective way of obtaining the information required. In particular, long term monitoring and studies which support the understanding of the population drivers are a bedrock for proper understanding of changes on bird populations in Wales but funding has been withdrawn. A lack of understanding and appreciation of the detail behind population changes seems to be to the fore here.

5. Conservation delivery

We are concerned that the amount of money being spent on conservation delivery has reduced, not only in real terms, but as a proportion of the organisation's overall budget.

It would appear, from the outside, that - notwithstanding the large sums being spent on Glastir – that NRW is putting less money into the delivery of biodiversity conservation than did the three constituent bodies. We appreciate that the grant-in-aid from the Welsh Government has been reduced, but are concerned that the proportion being spent on nature conservation has been reduced. In particular, we would suggest that the Committee enquires as to the funding contributed to partnerships with the NGO sector, which often helps to make projects happen by unlocking funding from other parties, such as lottery funding and the NGOs' own supporters.

We call on the Committee for a transparent analysis, perhaps in a year's time, of the money being spent on nature in Wales by the Welsh Government/NRW so that is evident what percentage of the WG budget is being spent on nature conservation delivery with clear outcomes. Residents of Wales will want to know whether statements made about such funding can be regarded as accurate ahead of the next Assembly elections.

6. Conclusion

We support the staff of NRW in the difficult transition to the new body but we think that NRW needs much stronger leadership in the area of wildlife conservation to provide the resources and profile needed to meet our international commitments.

Yours faithfully
Ian M Spence