

Agenda – Climate Change, Environment, and Infrastructure Committee

Meeting Venue:

Video Conference via Zoom

Meeting date: 9 December 2021

Meeting time: 09.15

For further information contact:

Marc Wyn Jones

Committee Clerk

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Private pre-meeting (09.00–09.15)

In accordance with Standing Order 34.19, the Chair has determined that the public are excluded from the Committee's meeting in order to protect public health. This meeting will be broadcast live on www.senedd.tv.

Public meeting

1 Introductions, apologies, substitutions, and declarations of interest

(09.15)

2 Marine environment management – evidence session 1: Natural Resources Wales

(09.15–10.15)

(Pages 1 – 36)

Rhian Jardine, Head of Development Planning & Marine Services – Natural Resources Wales

Mary Lewis, Sustainable Places Land & Sea Manager – Natural Resources Wales

Dr Jasmine Sharp, Lead Specialist Advisor, Marine Regulation – Natural Resources Wales



Attached Documents:

Research brief: Marine

Paper – Minister for Climate Change (response to letter from the Chair of 2 November 2021)

Paper – Natural Resources Wales

Break (10.15–10.25)

3 Marine environment management – evidence session 2: marine energy developers

(10.25–11.25)

(Pages 37 – 46)

Jess Hooper, Programme Manager – Marine Energy Wales (MEW)

David Jones, Stakeholder Engagement Manager – Blue Gem Wind

Attached Documents:

Paper – Marine Energy Wales

Paper – Blue Gem Wind

Break (11.25–11.40)

4 Marine environment management – evidence session 3: marine planning and Marine Protected Areas (MPAs)

(11.40–12:40)

(Pages 47 – 66)

Claire Stephenson, Senior Conservation Planner – RSPB Cymru

Clare Trotman, Head of Conservation Wales (Acting) – Marine Conservation Society

Emily Williams, Co-Chair, Marine Working Group – Wales Environment Link

Attached Documents:

Paper – RSPB Cymru

Paper – Marine Conservation Society

Paper – Wales Environment Link

Lunch break (12.40–13.20)

Private pre-meeting (13.20–13.30)

5 Marine environment management – evidence session 4: blue carbon and Marine Protected Areas (MPAs)

(13.30–14.30)

(Pages 67 – 81)

Sue Burton, Pembrokeshire Marine Special Area of Conservation (SAC) Officer

Sean Clement, Oceans Restoration Specialist – WWF Cymru

Clare Trotman, Head of Conservation Wales (Acting) – Marine Conservation Society

Dr Richard Unsworth, Associate Professor in Marine Biology, Swansea University, and, Director of Project Seagrass

Attached Documents:

Paper – Sue Burton

Paper – WWF Cymru

Paper – Dr Richard Unsworth

6 Papers to note

(14.30)

6.1 Climate adaptation

(Pages 82 – 83)

Attached Documents:

Letter from the Chair to the Minister for Climate Change in relation to a climate adaptation plan for Wales

6.2 Sewage discharges

(Pages 84 – 85)

Attached Documents:

Letter from the Chair to the Chair, Natural Resources Wales in relation to unpermitted sewage discharges

6.3 Common Frameworks

(Pages 86 – 87)

Attached Documents:

Letter from the Counsel General and Minister for the Constitution to the Chair, Legislation, Justice and Constitution Committee regarding Common Frameworks

6.4 UK Environment Bill

(Pages 88 – 89)

Attached Documents:

Letter from the Minister for Climate Change, and, the Counsel General and Minister for the Constitution, to the Chair, Legislation, Justice and Constitution Committee regarding the Legislative Consent Motion debate relating to provisions in the UK Environment Bill

6.5 Future Wales: the national plan 2040 – renewable energy policies

(Pages 90 – 96)

Attached Documents:

Correspondence to the Chair from Non Davies on behalf of Moelfre Residents in relation to renewable energy policies in the Welsh Government's Future Wales: the national plan 2040

Correspondence to the Chair from Clive Goodridge and Kate Watson in relation to renewable energy policies in the Welsh Government's Future Wales: the national plan 2040

Correspondence to the Chair from Dr Dean in relation to renewable energy policies in the Welsh Government's Future Wales: the national plan 2040

6.6 Velindre Cancer Centre

(Page 97)

Attached Documents:

Correspondence from an individual regarding the proposed location of the Velindre Cancer Centre

- 7 Motion under Standing Order 17.42 (vi) and (ix) to resolve to exclude the public from the remainder of the meeting
(14.30)**

Private meeting (14.30–15.30)

- 8 Marine environment management – consideration of evidence heard under items 2,3,4 and 5**
- 9 Consideration of the Committee's draft report on priorities for the Sixth Senedd**
- 10 Consideration of the Committee's Forward Work Programme**

Document is Restricted

Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref

Llyr Gruffydd MS
Chair
Climate Change, Environment & Rural Infrastructure Committee
Welsh Parliament
Cardiff
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1 December 2021

Dear Llyr,

Thank you for your letter of 2 November seeking an update on progress regarding the recommendations outlined in the Climate Change, Environment and Rural Affairs Committee report 'The Welsh Government's progress on Marine Protected Area management'.

Attached to this letter, I have provided an update to each of the recommendations taken forward. Furthermore, I attach an update regarding our Blue Carbon programme in Wales and developments with marine spatial planning.

Yours sincerely

Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Recommendation 1

The Welsh Government should bring forward as a matter of urgency an ambitious strategy for MPAs. It should do so by summer 2020. The strategy should focus on the need to take both local and network-scale approaches and to deliver the conservation objectives of individual MPAs, where applicable. The framework and action plan should sit under the strategy. The strategy should be accompanied by an explanation of how the Welsh Government plans to fund MPA Management on an ongoing basis. The strategy should be subject to full consultation and should be refreshed periodically.

Response

This recommendation was rejected by the Minister for Environment and Rural Affairs.

Recommendation 2

The Welsh Government should discuss with the MPA Management Steering Group how it can receive input from a broader stakeholder base and additional MPA management authorities. This could include broadening the group out to include additional members or the creation of relevant sub-groups. The Welsh Government should report back to this Committee on the outcome of those discussions.

Response

In a previous Ministerial role, the Minister for Environment and Rural Affairs established the MPA Network Management Steering Group in 2014 to provide overarching advice and guidance for the management of our MPA network. I consider this group to have appropriate representation from a broad range of stakeholders whom have a breadth of expertise to lead the management of our MPA network. The steering group is continuing to deliver its substantive function and has overseen some valuable and beneficial projects within the MPA Network Management Action Plans.

My officials established the Marine Resilience sub-group of WMAAG to allow wider discussions and consideration to marine biodiversity policy. The Marine Resilience sub-group allows for a broader membership with multiple interests and reports back to both WMAAG and the MPA Network Management Steering Group.

Recommendation 3

The Welsh Government should explore whether duties for Welsh Ministers, similar to those placed on English Inshore Fisheries and Conservation Authorities under the Marine and Coastal Access Act (2009), should be introduced in Wales and should report back to the Committee on this matter.

Response

In a previous Ministerial role, the Minister for Environment and Rural Affairs published the report on Brexit and Our Seas and issued a written statement: [Written Statement: A response to the Brexit and our Seas consultation and the next steps towards a future fisheries policy for Wales \(15 September 2020\) | GOV.WALES](#)

The Welsh Government remains committed to delivering a strategic approach to both fisheries and aquaculture and developing future fisheries policy in collaboration with stakeholders.

Recommendation 4

The Welsh Government should develop proposals, in consultation with the MPA Management Steering Group, for an area-based approach that would see management authorities put in an amount of money to the pot which is proportionate to the protected area for which they have responsibility. The funding for this should be in addition to, rather than instead of, funding for actions in the Action Plan.

Response

This recommendation was rejected by the Minister for Environment and Rural Affairs.

Recommendation 5

The Welsh Government should consider how the Marine and Fisheries Division will, in discussion with the five Welsh Relevant Authority Groups (RAGs), develop a more integrated approach to working with RAGs.

Response

Since the establishment of the MPA Network Management Steering group, membership has included several SAC Relevant Authority Groups (RAGs) in addition to a European Marine Site Officer (EMSO) offering an advisory role to the group.

My officials have explored options for further engagement and inclusion for RAGs through WMAAG and I can confirm RAG members are now well represented in WMAAG and the WMAAG Resilience sub-group.

Recommendation 6

The Welsh Government should identify the specific number of staff in the Marine Conservation Branch of the Marine and Fisheries Division and report back to this Committee.

Response

Civil service staffing is a matter for the Permanent Secretary. I have asked the Permanent Secretary to write to you on this matter.

Recommendation 7

The Welsh Government must ensure that marine biodiversity and conservation are reflected in its forthcoming tourism strategy.

Response

The Welsh Government's Tourism Priorities for the Visitor Economy for 2020-25 was published by the Deputy Minister for Culture, Sport in 2020. One of the core aims of the strategy is to develop tourism in Wales allowing economic benefit, but is environmentally sustainable, including the marine environment.

The Strategy promotes 'Environmental Sustainability', and in particular our natural resources. My officials commit to working with organisations involved in the protection and management of our outstanding landscapes, including the marine environment, to ensure this aim can be delivered.

My officials collaborate with Tourism Division and Visit Wales who are also a member of WMAAG. Members are closely involved in the development of the 'Blue Recovery Implementation Plan' which aims to enhance resilience in our marine environment.

Recommendation 8

The Welsh Government should write to marine wildlife tourism sector representatives to invite them onto the WMAAG (Wales Marine Action and Advisory Group) and should provide an update on the progress of the establishment of a Biodiversity sub-group of the WMAAG.

Response

My officials discussed this recommendation with WMAAG members to suggest a suitable representative for the sector. It was agreed there is not one organisation representing the marine wildlife tourism sector and concluded the group has suitable representation, including organisations such as RSPB and Wildlife Trusts Wales who are engaged in wildlife tourism.

The Minister for Climate Change recently met with WMAAG members and fully supported their Blue Recovery proposals. The Minister has asked members to work with officials to develop an Implementation Plan for delivery this Senedd term.

It is intended the plan will set out the delivery of the Programme for Government commitments, and current and planned WG work, but also encompass work to address ocean literacy, capacity building and long term sustainable investment in resilient marine ecosystems, providing a joined up approach to addressing the climate change and nature emergencies.

The group will be engaging more widely with stakeholders as part of its latest mandate to develop a Blue Recovery Implementation Plan.

Recommendation 9

The Welsh Government should explain why management has not yet been implemented as a result of the AWFA assessments for high-risk activities, which were published in 2017. It should bring forward a consultation on management options for those activities as a matter of urgency. The Welsh Government should agree a timetable with NRW for the completion of the remaining assessments, but this should be no later than January 2021. The Welsh Government should assess the level of resources that will be needed by NRW to complete this work.

Response

Welsh Government continue to work with NRW to progress the Assessing Welsh Fishing Activities project. In 2016, 516 assessments of gear-feature interactions were prioritised for delivery. Of these, 70 have been received from NRW with a further 39 medium priority bottom towed gear assessments due for delivery in March 2022.

The Assessing Welsh Fishing Activities project remains a priority and I will launch a public consultation once all towed gear assessments are completed and proposals for management measures are finalised.

Recommendation 10

The Welsh Government should explore the desirability of making the production of site-level feature condition reports and the collection of relevant monitoring information a statutory requirement.

Response

Site level monitoring data and reports are critical to understanding the condition of MPAs in Wales. They inform the evidence base supporting effective management and efforts to achieve and maintain the favourable condition of features.

There are multiple existing drivers for site level condition assessments in Wales, including: regulation 9A of the Conservation of Habitats and Species Regulations 2017; regulation 6A of the Conservation of Offshore Habitats and Species Regulations; section 124 reporting on the MPA network by the Welsh Ministers to the Senedd under the Marine and Coastal Access Act 2009; the State of Natural Resources Report under the Environment (Wales) Act 2016; regulations 10 and 13 of the Marine Strategy Regulations 2010; and feature level reporting by UK Government to the OSPAR Commission. Whilst these do not state specific statutory requirements, it should be recognised that they drive site level condition assessment as this is a key way to achieve the overall reporting outcomes required. NRW has reviewed the approach to MPA site condition assessments through the EMFF funded Improving Marine Site-level Condition Assessment Reporting project. The findings of this project and the process developed will be embedded within the NRW reporting obligations in a 6 yearly cycle.

Recommendation 11

The Welsh Government should ensure that MPA evidence gaps are addressed through the implementation of the Marine Evidence and Fisheries Evidence Plans.

Response

Welsh Government continue to work closely with NRW, JNCC and wider stakeholders to develop our marine evidence base and monitor progress towards fulfilling evidence needs highlighted within the Welsh Marine Evidence Strategy. This includes science and evidence required for delivery of our MPA network obligation.

Recommendation 12

The Welsh Government should report back on the progress of the work of the Task and Finish Group established to identify potential MCZs. The Welsh Government should ask the Task and Finish Group to bring forward proposals for consultation as soon as possible, but no later than February 2020.

Response

The MCZ Task and Finish Group (TFG) and project team have continued to meet and work together on the identification of potential MCZs in Welsh waters and a series of virtual meetings have taken place.

The MPA Network Completion project remains a priority, however, I should note all Welsh Government departments are stretched at present primarily due to pressures as a result of our exit from the European Union and our response to the Covid-19 pandemic. This has put significant pressure on our resources and ability for officials to deliver other programmes of work. Officials will launch a pre-consultation engagement in early 2022 forming part of our evidence gathering ahead of a formal consultation.

I continue to be mindful of the need to ensure stakeholders and the public are properly engaged and consulted to ensure support. Timeframes for the project will reflect the legal requirement under Section 119(10) of the Marine and Coastal Access Act, 2009, concerning consulting before designating.

Recommendation 13

The Welsh Government should ask the Task and Finish Group to consider, as part of its work, the need for highly-protected MCZ designations. This consideration should be informed by extensive consultation with interested parties, such as fishers.

Response

This recommendation was rejected by the Minister for Environment and Rural Affairs.

Recommendation 14

The Welsh Government should ask the Task and Finish Group to develop a plan for designating MCZs for mobile species.

Response

I remain committed to exploring the need to designate MCZs in Wales as part of the MPA Network Completion project. The Task and Finish Group are taking a staged approach, focusing on habitats designations in the first instance. However, designations for mobile species remain part of the discussion for future consideration.

Recommendation 15

The Welsh Government should undertake or commission an assessment of the impact on MPA management of leaving the EU, including a potential loss of access to EU research, institutions and funding. In so doing, it should explain how it will mitigate any such impact.

Response

Of the £375m of regional annual funding Welsh Government received from the EU, £60m went into funding research development and innovation. The replacement Shared Prosperity Fund which the UK Government has promised will fully replace these lost funds, has not yet fully come into operation. It is not clear how this fund will be allocated to devolved administrations but I am concerned it will fall significantly short of the £375m we originally received.

Welsh Government remains committed to bring forward plans for an investment led recovery through delivering our programme for government, based on the needs of the people of Wales. We will publish the Welsh Government Budget on 20 December and will seek to deliver the fairest possible settlement for Welsh public services to secure a more prosperous and greener Wales.

Marine and Fisheries funding proposals on a successor scheme to the EMFF are still in development for 2022/23.

Investment through the EMFF successor scheme will contribute to the Welsh National Marine Plan, the Well-being of Future Generations (Wales) Act as well as the principles and specific commitments in the Programme for Government along with commitments made in the JFS and Fisheries Management Plans.

Update regarding marine spatial planning

The Welsh National Marine Plan (WNMP) was adopted by the Welsh Ministers in November 2019. Together with the UK Marine Policy Statement, it sets a strategic framework for the sustainable development of Welsh seas. Following publication, the WNMP was supplemented with Implementation Guidance, providing information to guide the practical

application of Plan policy and help ensure its effective and consistent implementation. Officials have worked with a range of public authorities to support Plan implementation. A Monitoring and Reporting Framework for the WNMP was published in January 2020, providing the basis for the first formal review and monitoring report on the Plan, due in 2022. Officials have conducted a User Survey to inform the report and intend to conduct a second User Survey in spring 2022.

Since the WNMP's publication, officials have worked with stakeholders to progress a spatial approach to the implementation of Plan policy, providing spatial direction and context for development.

Through the recently completed Sustainable Management of Marine Natural Resources (SMMNR) project, officials conducted seabed survey and ecological mapping to help inform the planning for the tidal stream energy, wave energy and aquaculture sectors. Interactive online environmental mapping and evidence package 'Storyboards' have been published to share the mapping methodology and project outputs, allowing users to focus on specific spatial areas or environmental considerations.

The SMMNR project outputs have been used, together with work to better understand the nature of potential cross-sector spatial interactions in Welsh seas, to develop Sector Locational Guidance (SLG) for the tidal stream energy, wave energy and aquaculture sectors. SLG, through providing clarity on the distribution of natural resources and associated considerations in relation to sustainable use, aims to help guide activity towards areas which may best accommodate new development without compromising the resilience of marine ecosystems.

As part of a spatial approach to supporting plan implementation, the Welsh Ministers have recently initiated work to map potential Strategic Resource Areas (SRAs) to identify and apply WNMP safeguarding policy to key areas of resource. The approach to identifying potential SRAs and design principles to guide SRA development have been co-developed with the Marine Planning Stakeholder Reference Group (MPSRG).

Welsh Government has also been providing marine planning input to a range of UK-wide initiatives to support the sustainable deployment of fixed and floating offshore wind. Looking ahead, we will publish SLG for the tidal stream, wave energy and aquaculture sectors and work with stakeholders to progress the development of potential SRAs, consulting on proposals. We will also report in 2022 on the effect of WNMP policies and progress towards achieving Plan objectives and, as part of this reporting process, consider the need to amend the WNMP or to re-plan in the context of the rapidly changing UK marine landscape.

Update regarding the emerging role of Blue Carbon in Wales

I recognise the increasingly important role blue carbon can play in addressing both the nature and the climate crises, and Net Zero Wales includes a new proposal to improve our understanding of both how we could account for the contribution it makes through the Greenhouse Gas Inventory, and the potential impacts of human activity and climate change itself on blue carbon habitats and emissions.

My officials are working closely with NRW, the other administrations and the scientific community to understand the issues and opportunities better, and we will work together with the intention to establish a UK Blue Carbon Evidence Partnership early next year, to address those questions. In Wales we will develop and deliver a shared blue carbon evidence plan both to direct the UK partnership and to inform specific Welsh evidence

needs. Discussions have begun around the potential to form a working group to progress this evidence plan.

In the meantime, through our Welsh Marine Protected Areas network and active decision making using the Welsh National Marine Plan we will continue to manage many of those habitats which maintain and enhance blue carbon.



Briefing to the Climate Change, Environment and Infrastructure Committee

Marine Environmental Management

November 2021

This note covers progress to date in a number of key NRW work areas, and also highlights some barriers and opportunities for further progressing sustainable marine environmental management.

1. NRW's role in marine environmental management

NRW's general purpose is to pursue the sustainable management of natural resources. This role extends to the marine environment which makes up almost half of the territory of Wales. NRW's role in relation to marine environmental management is wide ranging including, for example: advice, evidence, regulation including marine licensing, monitoring, coastal flood risk/erosion management, incident response, protected site management, cockle fisheries management (Dee and Bury inlet) and the Dee navigation authority.

2. Progress to date, forward barriers and opportunities

Marine consenting and licensing

NRW delivers marine licensing on behalf of Welsh Ministers for licensable activities throughout the Welsh Zone. For example, between June 2020 and November 2021, in the

marine renewable sector NRW issued 12 marine licences; 5 licences relate to construction, alteration or improvement works associated with the renewable energy sector and 7 licences were issued in respect of project site survey work. Welsh Government are the enforcement authority for marine licensing in Wales.

NRW's Marine Licensing Team also provides bespoke pre-application advice. Pre-application advice has clear benefits to the applicant, helping to identify issues upfront, understand requirements of the marine licence process and has the potential to reduce the formal determination period. To support customers, we have also increased the amount of web content available on the marine licensing process and guidance on the evidence and assessment required to accompany applications.

To support marine renewable projects and reduce administrative burden, we have been developing a number of Ways of Working agreements between NRW and other regulatory authorities. We continue to share best practice with other marine licensing authorities. This has been particular benefit for the marine renewable sector where sharing experiences from projects in Scotland helped to inform our approach to adaptive management.

Barriers and opportunities: There is significant overlap between regulatory duties and responsibilities which can pose challenges to developers and requires good co-ordination by the regulatory bodies. Major infrastructure projects, especially energy, require multiple approvals and permits. It would be beneficial to ensure alignment of regulatory regimes, to streamline aspects, avoiding duplication of effort and providing clearer routes for stakeholder input.

There is often a perception that marine licensing applications for developments in areas of policy priority ought to be able to be "fast tracked". However, NRW must equally robustly assess all applications by following the statutory decision-making process and supporting assessment and advisory process which together provide important environmental, human health and safety, procedural and legal safeguards. Speed of determination is mainly dependant on the quality of the information provided by the developer. Increased engagement in pre-application advice and engagement with other stakeholders will support the submission of robust licence applications and help decrease the determination timescale of an application.

A key barrier to obtaining consents for marine renewable energy is the uncertainty surrounding key environmental impacts, stemming from both a scarcity of baseline environmental data, and a lack of direct evidence of the impacts of specific energy devices. Further relevant opportunities are covered below under OREP and marine planning.

Marine renewable energy and the Offshore Renewable Energy Programme

The combination of regulatory and advisory functions places NRW at the forefront of supporting sustainable marine renewable energy (MRE) development in Wales, which has great potential to further support carbon reduction targets. In 2019 we established NRW's Offshore Renewable Energy Programme (OREP) as a direct response to increasing scale of MRE development, and growing political, public and policy interest in Wales, including meetings with the First Minister in 2019 to explore developing our role.

The overall aim of OREP is to reduce the environmental and consenting risks of MRE development. Specifically, OREP has built NRW's capacity and expertise to deliver:

- Improved case management and pre-application advice
- Development of key positions and guidance
- Additional dedicated staff resource that focuses solely on MRE - developing and maintaining continuity of the necessary expertise
- Critical evidence to reduce consenting uncertainties and address the perceived conflict between the twin climate and biodiversity emergencies
- Increased external engagement with key stakeholders.

We are currently advising on 15 major and / or novel and complex MRE plans and projects. In addition, OREP enables development of key guidance and evidence projects; for example, development of guidance on the use of Adaptive Management as a tool that can allow developments to be consented when the environmental effects are not well understood.

NRW also engages with strategic initiatives across Wales and the UK to improve MRE delivery, such as: The Crown Estate's Offshore Wind Evidence & Change Programme and the WG Marine Energy Programme & Tidal Lagoon Challenge.

Barriers and opportunities: OREP is temporarily funded until March 2022 when the benefits will come to an end. The number of plans and projects that NRW will be advising on and regulating will continue to increase significantly, especially with the prospect of new fixed and floating offshore wind and the Tidal Lagoon Challenge. Investment into NRW to secure the OREP approach to delivering MRE is required longer-term to meet this demand for MRE whilst at the same time supporting other government priorities for the environment. To illustrate the capacity needs, NRW's current engagement in the Awel y Mor offshore windfarm project has been ongoing since 2019 and to date amounts to 320 hours of advisor's time.

Ongoing and increased investment is also needed to improve the marine environmental evidence base to help reduce environmental risk and to facilitate efficient and timely decision-making and, ultimately, deployment. This is a shared responsibility for Government, developers and NRW.

NRW is the statutory consultee for advice on development consents and marine licences in Welsh waters within 12nm. JNCC has this responsibility in the Welsh offshore marine area beyond 12nm. Similar functions have been successfully streamlined around Scotland and England, with advisory responsibilities delegated to Nature Scot and Natural England. This has reduced complexity and increased efficiencies for developers, regulators and advisors. A similar arrangement could usefully be adopted to address the anomaly around Welsh waters.

Marine planning

The Welsh National Marine Plan (WNMP) provides the primary framework for sustainable marine development. NRW has undertaken substantial work to support implementation of the WNMP. This includes developing marine licensing procedural guidance, advisory positions, training staff, and a marine casework handbook to support application of advisory principles and plan policy in our advice.

Barriers and opportunities: Strategic sectoral planning and a developing a spatial approach for marine planning will provide greater support to identify key resource areas, alongside sensitivities and constraints, to help minimise consenting risks by steering developments to locations where impacts to the environment and other users are lower. NRW is now taking a lead role in providing the evidence to support WG in the development of more spatially prescriptive planning, by identifying the spatial environmental considerations for different sectors.

Marine evidence gaps and gathering

Since its creation NRW has made a strong commitment to be an evidence-based organisation. We seek to ensure that our strategy, decisions, operations and advice to Government and others are underpinned by sound quality-assured evidence.

The [Welsh Marine Evidence Strategy](#) (2019), jointly developed by WG and NRW, outlines the high-level strategic marine evidence priorities needed to support marine policies and plans in Wales. The strategy provides a framework for collecting evidence including research and development, monitoring and surveillance, and secondary analysis and synthesis, whilst improving collaboration.

Within NRW, the Marine and Coastal Evidence Programme produces a prioritised list of evidence needs on an annual basis. The Marine Monitoring Programme is also prioritised, with a regular cycle of monitoring, focusing on the Water Framework Regulations (2019) and Marine Protected Areas.

Over the past few years, the country nature conservation bodies, JNCC and other UK partners have reviewed risk-based priority monitoring options for most UK marine habitat and species groups. A business case has been developed in support of all the preferred monitoring options and submitted to DEFRA.

NRW's marine evidence priorities for the next year include monitoring, collation of baseline information to inform multiple work areas (e.g. marine mammal distributions, habitat mapping), work to inform offshore renewable energy advice and blue carbon studies.

We collect our evidence through a variety of routes, including work in house, work contracted out, citizen science projects and collaborations with other organisations, including academia, Government and industry.

We anticipate that at least 15 marine and coastal evidence reports will be produced in 2021. The majority of our reports are published on our website here: [Natural Resources Wales / Marine and coastal evidence reports](#). A further set of reports were produced in 2020 and are now being converted to accessible format before being uploaded to our website.

Barriers and opportunities: It is fundamentally important that we understand the state of our marine and coastal environment if we are to make sound decisions concerning management. However, the funding available for marine monitoring falls well short of what is required. For example, the preferred Welsh option for inshore benthic monitoring totals at just over £3 million (including existing staff and resources). Excluding staff that would come to about £2 million. The resources for marine monitoring have decreased over the last 9 years.

Many of our evidence needs are complex problems that need to be tackled with multi-year research programmes. Unfortunately the annual cycle of funding makes it extremely difficult for NRW to enable this.

In the future we hope to work with the Environment Platform Wales to create better links with academia and to disseminate our research needs.

MPAs, ecosystem resilience and restoration

Improving the management and condition of the Marine Protected Area (MPA) network is a priority for NRW in order to deliver marine ecosystem resilience. A wide range of NRW's advisory, evidence, regulatory and operational work contributes to this. We routinely deliver actions in the Wales MPA Network Management Action Plan across our functions. We were also able to use capital funding made available by WG during 2020-2021 to undertake a range of improvements to sites including, for example, artificial habitat enhancement in seawalls around Milford Haven and feasibility work to explore saltmarsh restoration at Rhymney Wharf.

NRW is also providing advice and evidence to support WG's project to complete the MPA network through the designation of Marine Conservation Zones.

Barriers and opportunities: Understanding condition of MPAs is essential to informing appropriate action. Following publication of a full suite of indicative MPA site condition assessments in 2018, we are approaching completion of a project to develop new reporting indicators to apply as part of a planned full revision of NRW's conservation objective advice for MPAs. This will ensure we are giving the best advice and assessments to support decision-making on activities in and near MPAs.

Restoration is a key focus now for marine ecosystem resilience including most recently a commitment within the Programme for Government for a targeted programme of restoration of saltmarsh and seagrass habitats (also key blue carbon stores). Active restoration in the marine environment presents substantial practical challenges but nevertheless work is underway from which we can learn and take further action. NRW is already leading on an European Maritime and Fisheries Fund-funded project actively restoring native oyster habitat in Milford Haven with an emphasis on learning how to scale up such projects. The Natur am Byth partnership project includes an ambitious marine element focussing on restoration of sea grass, oysters, pink sea fan and crawfish. We have also published opportunity maps indicating potential areas for restoration of a range of marine and coastal habitats (see Annex 2).

Most recently, NRW has begun to develop a prioritised, integrated forward work programme for active restoration that reflects the wider practical, evidence, advice and regulatory implications for NRW of this developing area.

Blue carbon

NRW has undertaken important research in relation to blue carbon to support enhancing blue carbon stores in Wales, including:

- Quantifying the blue carbon potential of the Welsh marine and coastal environment (See Annex 1)

- Current research to further identify carbon storage and sequestration at a feature and MPA level across the network; this work is also identifying management options to enhance the carbon sink in Wales

Barriers and opportunities: There is no framework for protection of blue carbon *per se* and hence enhancement needs to be seen as a wider societal benefit derived from effective and sustainable management of the marine environment that enhances ecosystem resilience, biodiversity, habitat extent and condition. We have prioritised a forward work programme to embed consideration of blue carbon in all aspects of our advice, and to further develop the evidence on how and where we can enhance the sequestration of blue carbon in marine and coastal areas.

Coastal management

The coastal interface is an area where the impacts of climate change are felt acutely due to sea-level rise. NRW has put in place an Integrated Coastal Management Programme to bring together different work streams in NRW, including flood risk management, biodiversity, planning, regulation and access, to address the particular challenge of climate change at the coast. The programme is delivering a wide range of action, including, for example a joined-up approach to guidance assessing and addressing coastal squeeze, taking account of recent WG policy development in this area.

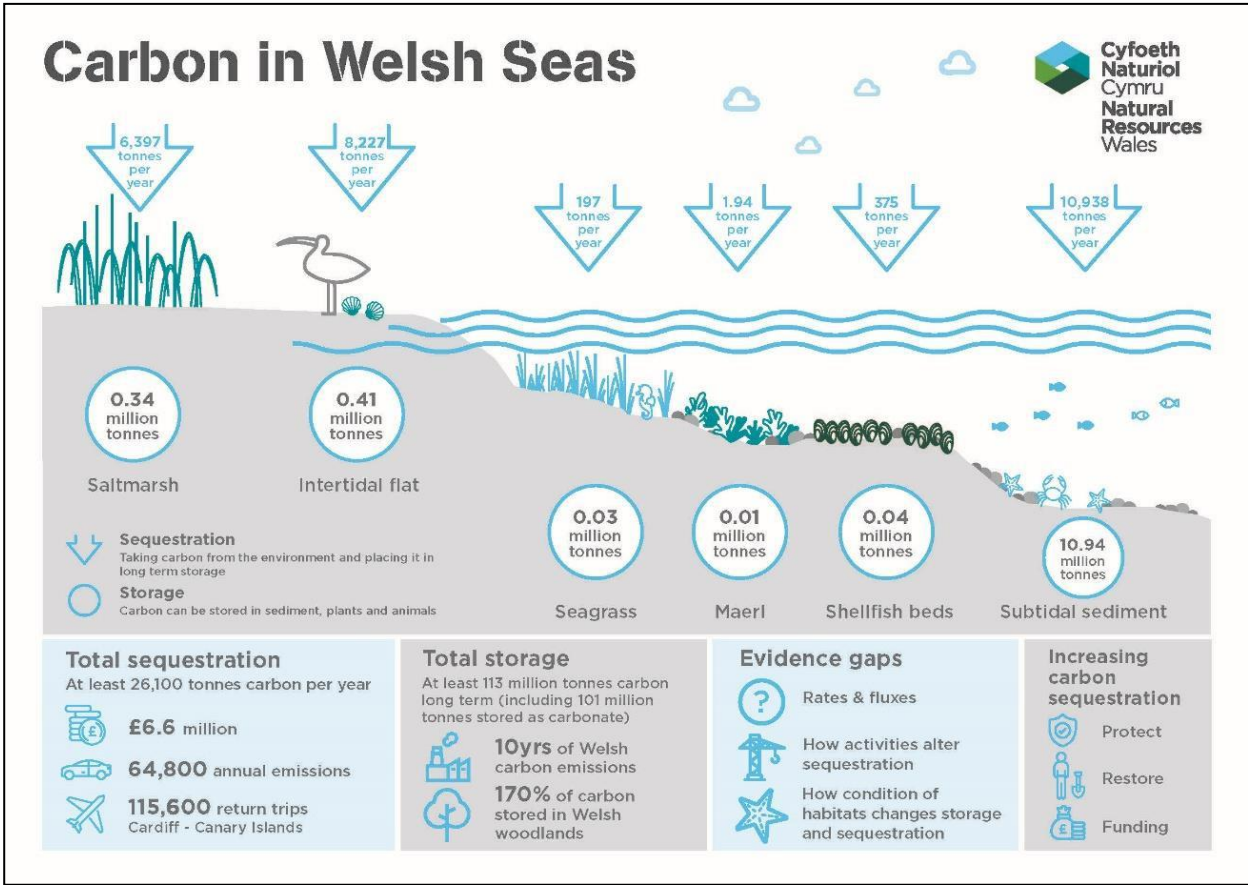
Barriers and opportunities: The coastal area is subject to a highly complex legislative and regulatory framework. Addressing the key challenge of climate change and rising sea levels will require addressing a number of barriers and requires significant dialogue and engagement with local communities to identify effective solutions to the issues they face. Shoreline Management Plans are non-statutory documents but should be a crucial tool in enabling the sustainable management of our coastline. Nature based solutions such as restoring coastal habitats (e.g. salt marsh) or using techniques such as beach nourishment, provide opportunities to deliver multiple benefits in terms of coastal protection, biodiversity gains and blue carbon.

Stakeholder engagement

Engaging with a range of marine and coastal stakeholders is a core element of both NRW's strategic and operational work. We participate actively in a range of partnerships including, for example, the Wales Marine Action and Advisory Group and Offshore Consenting Strategic Advisory Group. We published the Marine Area Statement in 2019, the culmination of a programme of engagement with a range of our partners to identify the key priorities and opportunities for the sustainable management of the marine area. We continue to work collaboratively to deliver the actions identified within the Area Statement.

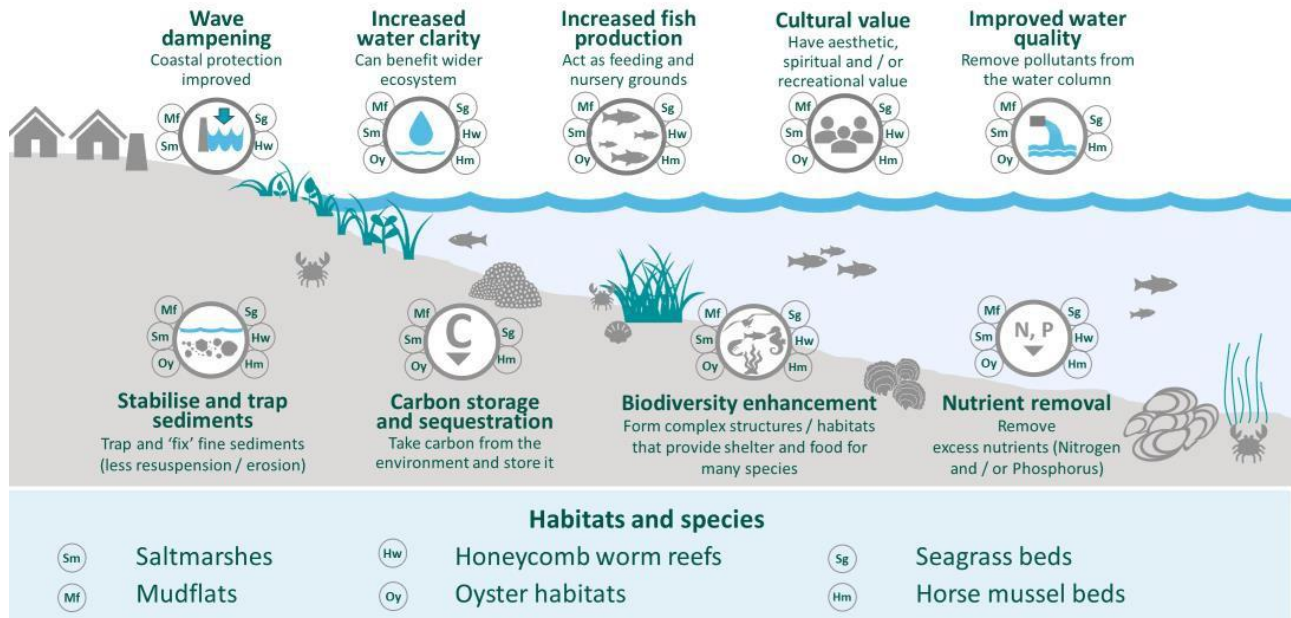
Barriers and opportunities: A recognised barrier to stakeholder engagement and collaborative working is a lack of capacity amongst marine partners in Wales, coupled with a lack of awareness amongst coastal communities of the challenges and opportunities presented by marine and coastal environments. This has been recognised in the work of the Wales Marine Action Advisory Group around a Blue Recovery. There is an opportunity to influence funding streams in Wales in a way that can build capacity and awareness and therefore support more active engagement and delivery of marine and coastal projects and activities.

Annex 1: Summary of blue carbon in Welsh seas



Annex 2: Summary of the benefits of restored marine and coastal habitats

Benefits of restored marine and coastal habitats





Ministerial Priorities for the Climate Change, Environment, and Infrastructure Committee

We are writing in response to the Climate Change, Environment and Infrastructure Committee's call for evidence on priorities for the term of the sixth Senedd. Marine Energy Wales (MEW) welcomes the opportunity to represent our membership and provide feedback to this consultation around the opportunity of emerging offshore renewable energy in Wales. This is a sector which can deliver a meaningful contribution to the clean energy transition for Wales, anchor a burgeoning sector on Welsh shores providing economic development, regeneration and skills in Wales as well as a fulfilling a significant role in supporting a strong, green recovery from Covid-19 and a robust energy solution for climate change.

This consultation response seeks to provide a brief summary of the industry, to highlight the importance of the emerging offshore renewables sector to drive decarbonisation and the green recovery here in Wales, and to identify the Ministerial priorities that we would like to see in the next 12-18 months.

Marine Energy Wales

Marine Energy Wales (MEW) is *the* industry led stakeholder group representing the wave, tidal and floating offshore wind industries in Wales. **MEW brings together technology developers, test centres, wider sectoral alliances such as the Celtic Sea Developers Alliance and Tidal Range Alliance, the supply chain, academia and the public sector to establish Wales as a global leader in sustainable emerging offshore renewable generation.** MEW participate in, and contribute advice to key strategic projects underway in support of the sector such as MEECE, Tiger, Selkie, as well as the Celtic Sea Cluster and Celtic Sea Developer Alliance. MEW's vision is to create a thriving and diverse emerging offshore renewables industry in Wales, making a significant contribution to a low carbon economy.

The Welsh Opportunity

MEW champions a green economic recovery with emerging offshore renewable energy playing a pivotal role. Harnessing the power of the sea will provide a clean, low carbon and sustainable source to meet the UK's energy demands and contribute to a successful, resilient and diverse UK energy mix which aims towards net zero. Wales has a unique offer with abundant tidal, wave and wind resource right on our doorstep.

- **A Significant Resource** – Wales has significant, diverse wave, wind, tidal stream and tidal range resources. The UK's practical resource has been independently estimated at 15GW for tidal stream

and 23GW for wave energy¹ and approaching 20GW for tidal range including 6GW in Wales. There could be at least 50GW of electricity capacity available in the Celtic Sea in Irish and UK waters for floating wind².

- **People** – Wales has an experienced and skilled supply chain with extensive industrial and energy sector experience, which has already seen diversification into construction and deployment of emerging offshore renewable devices. With over 256 direct FTEs (with further indirect supply chain multipliers increasing this number), the sector is providing skilled employment, regeneration of peripheral communities and ports, and is encouraging low carbon economic growth in coastal regions across the country. Floating offshore wind alone is expected to generate 3000 jobs by 2030 *if* the early mover opportunity is seized. The Welsh supply chain has the capability, capacity and ambition to deliver emerging offshore renewable projects and the burgeoning industry offers real opportunities for local companies to diversify.
- **Developers** – There are 20 emerging offshore renewable technology and project developers actively progressing projects in Wales with seabed agreements in place for over 500MW of emerging offshore energy sites.
- **Test Centre Network and Demonstration Zones** – A number of test and demonstration sites are under development in Wales including the Pembrokeshire and Anglesey Morlais array scale Demonstration Zones, Marine Energy Test Area in Pembroke Dock and Ramsey Sound. These projects will provide test beds for innovative wave, tidal stream and floating wind technologies, enabling valuable learning across the sector and adding to the UK's world-leading test centre network. These will continue to attract not only the interests of UK based technology developers, but also further the inward investment successes already achieved from countries including Australia, Sweden, France and Spain.
- **Technology and Research** – Expert academic and world-class emerging offshore renewables research facilities at Swansea, Bangor and Cardiff universities including the Selkie Project and SEACAMS2.
- **Infrastructure** – Wales has eight strategically located ports and facilities sited along the North, West and South coast. R&D trials are currently underway to assess the potential opportunity that hydrogen production, storage and handling may also represent to Wales. There is significant storage and pipeline capacity at a number of Welsh ports which could represent a solution for alternative use of emerging offshore energy power; to be used to produce **green hydrogen** instead of being exported to grid. This green hydrogen could contribute to Ofgem's minimum 80TWh hydrogen requirement to decarbonise shipping and HGV sectors by 2050 in net zero scenarios³.
- **Grid Connection** – Wales has accessible 400kV transmission lines adjacent to resource areas which makes it stand out compared to other areas of the UK and Europe. Wales is a strategically important net exporter of power to the UK grid, generating more than double the electricity it consumes.
- **Two Strategic Alliances** - The Celtic Sea Alliance is a collaboration programme between Cornwall, Wales and Ireland to progress the development of utility scale Floating Offshore Wind development

¹ ORE Catapult (2018) [Tidal stream and wave energy, cost reduction and industrial benefit](#)

² ORE Catapult (2020) [Supply Chain Report: Benefits of floating offshore wind to Wales and the South West](#)

³ National Grid (2020) [Future Energy Scenarios](#)



in the Celtic Sea. The Tidal Range Alliance works to highlight the scale, capacity, reliability and energy security/stability offered by tidal lagoons and barrages. It aims to demonstrate how tidal range projects will help to meet future electricity demand in a way that is compatible with climate change commitments and will be multi-functional (energy, environment, flooding protection and mitigation) and multi-generational.

- **The formation of cross border clusters** - MEW is a member of the Celtic Sea Cluster, which is part of the wider group of UK clusters supporting the development of offshore wind energy under the UK government's Sector Deal. The South West Industrial Cluster is also exploring mechanisms for decarbonising heavy industry in Wales including using emerging offshore renewable solutions to produce hydrogen.
- **Swansea Bay City Deal and North Wales Growth Deal** – The £60 million City Deal PDM project includes a UK Catapult led Marine Energy Engineering Centre of Excellence based in Wales, Marine Energy Test Area, Pembrokeshire Demonstration Zone and port infrastructure upgrades to develop a hub for marine energy in Pembrokeshire. There will also be tidal energy opportunities for the Morlais project through the North Wales Growth Deal.

Emerging offshore renewable energy presents an opportunity for Wales to **keep its own renewable energy technology value locally by supporting a currently homegrown industry to deliver a low carbon economy, with its own jobs and prospects, and export the knowledge, skills and expertise globally**. All whilst delivering a number of technological **solutions for the clean energy transition and decarbonisation of industry**.

Ministerial Priorities

In their letter, the Minister and Deputy Minister outlined that to support energy system transitions within the wider net zero agenda, we need to transfer to renewable sources of power and that energy generation must evolve in line with these wider changes. Marine Renewables **contribute to a diverse and resilient energy mix**. The wind does not always blow and the sun does not always shine. Marine renewables can address fluctuations in these energy sources to ensure that the lights stay on. They also enable **energy independence by reducing our reliance on fuels imported from abroad**. Generating power from **multiple diverse sources** is key to delivering a continuous uninterrupted supply of renewable energy to our homes.

The letter also references the Welsh Government's Marine Energy Programme, which we have been very enthusiastic to support, providing an interface to the marine renewable energy sector and seeking to understand ways in which Welsh Government can accelerate progress for the sector.

Despite a natural competitive advantage, innovative initiatives within the sector, and significant maritime experience developed over centuries, the **Welsh evolution of our energy generation is currently falling behind other areas of the UK and international competition due to a challenging consenting regime, slow delivery of policy intent and insufficient investment in infrastructure**. Resulting in the potential forfeit of the associated jobs, prosperity and economic growth for Wales as well as the provision of secure and predictable energy to the energy mix. Thus we risk once inherent strengths, including know-how, technology, economic value and employment prospects, leaving Wales and being drawn overseas.

With adequate and consistent policy and financial support from government, we will be able to capitalise on this innovative maritime opportunity that supports supply chain resilience and clusters, in some of our most peripheral economies across Wales. Which, we are already seeing, represents significant global export potential.

Wales' ongoing ability to benefit from this new low carbon opportunity will ultimately depend on;

- the delivery of government policy in support of clean technology deployment.
- timely deployment of our technology that is not unduly constrained by the consenting regime;
- ensuring the infrastructure required to build the technology and export the power is available at the right time and to the right scale;
- enabling the upskilling and up-tooling of our supply chains; and
- a renewed approach to the opportunity of tidal range in Wales.

The overarching asks of the sector are set out below to provide context. Appreciating that some of these have long timeframes associated, suggestions for Ministerial prioritisation for the next 12-18 months are provided in bold.

Revenue support for wave and tidal stream projects - Continue to work with the rest of the UK to make a case at UK Government level to secure meaningful revenue support for wave & tidal stream technology through the Contracts for Difference (CfD) Scheme and Innovation Power Purchase Agreement (IPPA). Noting that an announcement is anticipated in the coming months around the CFD provision, whilst focus needs to be maintained on BEIS we have initiatives underway that can further support and accelerate progress in this regard. The Minister should seek to **support the Marine Energy Programme activities to provide a Welsh specific revenue support mechanism for early-stage technology projects in Wales to bridge the gap between grants and the CfD**. In combination with the CFD announcement the market signal and impetus that this would build for the sector could be considerable, anchoring technology companies in Wales that may otherwise be considering European relocation options to make securing grant funding easier.

Consenting and Evidence – We would welcome **increased support through both funding and personnel resources at the regulator, Natural Resources Wales (NRW)**. In order to ensure suitable and appropriate allocations, an **in-depth assessment of the delivery and timeframes associated with consenting** is recommended. NRW needs support from Government policy in order to make timely and pragmatic decisions and to collaborate further with the sector. A **clear mandate for NRW** to enable the deployment of more devices in the water, would result in an increased availability of evidence to progress the industry which currently poses a significant constraint to timely deployment and thus the appeal of development in Welsh waters. The Committee should simultaneously pursue the **prioritisation of the introduction of the Wales Infrastructure Consenting bill** at the earliest opportunity within the Senedd term to enable the existing arduous consenting processes to become streamlined and efficient.

Infrastructure and Supply Chain – A focus on the timeline for the **building of required infrastructure and developing grid capacity** is key to enable the growth and progression of the industry to deliver projects and the timely energy transition referenced in the Ministers' letter. Port development needs to be able to accommodate large scale technology components to be able to maximise opportunities for the sector in the 2030s. Furthermore, to address grid constraints integration with broader SMART energy systems and with the hydrogen economy should be encouraged. **Timely delivery of recommendations to Welsh Government's reports undertaken on grid and ports** should be encouraged by the committee. Support Welsh supply chain companies to become competitive through improved infrastructure and training, and wider initiatives to grow the skills needed to support the marine energy sector; using stepping stone projects to build capacity.

Celtic Sea – Encourage the UK Government to implement a **CfD system that supports the use of local supply chain even if it is more expensive to do so**, recognising the potential GVA benefits associated. Invest in ports to enable solutions that bring decarbonisation, regeneration and economic benefits to Wales. **Engage with The Crown Estate (TCE) to ensure that opportunities for 'early commercial stepping stone' floating offshore wind projects in the Celtic Sea are delivered through a timely leasing framework for**



generation up to 300MW in output. Support the development of the Celtic Sea as a floating wind development zone; working in collaboration with Ireland and the South West of England.

Tidal Range - Wales can lead the way in developing the necessary framework to demonstrate the value of tidal range to the UK. Rather than concentrating on simple cost of energy models, there **needs to be broad recognition of tidal range's unique multi-generational operating life, extensive co-benefits and contribution to Wales and the UK's energy security, stability and Net Zero targets.** We support the ongoing activities of the Marine Energy Programme and emphasise the need for a **fresh assessment of tidal range**, recognising these factors and using up-to-date independent engineering and financial models would not only provide the much-needed evidence needed to compare tidal range's unique features and benefits against other forms of low-carbon energy, but also provide the technical, environmental and financial models to guide Government and investor decisions.

Overall, we believe the committee must scrutinise the efficacy of Wales' efforts to both deliver and anchor this sector of significant promise here, in Welsh waters and on Welsh soil. After such commitment and support in recent years, the timely delivery of policy impact and a coordinated strategic approach to the ability to deploy in Welsh waters and achieve timely project development must be achieved. So that Wales' contribution to, not only national decarbonisation, but also to delivering solutions that can be used on a global scale to make a meaningful Welsh contribution to Climate Change.

We would welcome the opportunity to present the case for marine renewable energy and the sector asks of Welsh Government in more detail at any oral evidence sessions which result from this consultation. We look forward to continued engagement with the Climate Change, Environment and Infrastructure Committee on this emerging sector and the opportunities it presents.



Blue Gem Wind

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Blaenoriaethau ar gyfer y Chweched Senedd / Priorities for the Sixth Senedd
PR19
Ymateb gan Blue Gem Wind / Evidence from Blue Gem Wind

Llyr Gruffydd MS
Chair of the Climate Change, Environment and Infrastructure Committee
Welsh Parliament
Cardiff Bay
CF99 1SN

8th September, 2021

Dear Llyr,

Ministerial Priorities in Relation to Climate Change, Environment and Infrastructure

We are writing in response to the Climate Change, Environment and Infrastructure Committee's call for evidence on priorities for the term of the sixth Senedd. Blue Gem Wind welcomes the opportunity to outline its view on the strategic priority for the Committee in order to promote economic development, regeneration and skills in Wales and the role that the deployment of floating offshore wind can play in supporting a strong, green recovery from Covid-19.

Blue Gem Wind

Blue Gem Wind is a joint venture between Simply Blue Energy, a pioneering Celtic Sea energy developer, and TotalEnergies, one of the world's largest energy companies. Blue Gem Wind is currently developing two floating wind sites with a combined capacity of ~400MW in Welsh waters of the Celtic Sea. The first project, Erebus (96MW), is Wales' first floating offshore wind farm c.45 km off the Pembrokeshire coastline and will provide enough energy for 90,000 homes. The second, larger project, Valorous (300MW), is to be located c.50 km off the Pembrokeshire coastline and will provide enough energy for 280,000 homes. Combined, these projects represent international inward investment of over £2.5 billion.

Blue Gem Wind's development focus is on maximising opportunities for the supply chain. A stepping stone approach, whereby floating wind projects progress from initial test and demonstration scale projects to larger early-commercial developments, will help to capture the



Blue Gem Wind

highest local supply chain content for the projects that follow. This approach was adopted in response to a report by the Offshore Renewable Energy Catapult (OREC) for the Crown Estate

Scotland in 2018¹, that identified stepping stone projects as the best way to enable local supply chain growth in this new sector.

Floating Wind

For us, floating offshore wind combines two technologies that have been proven throughout the world, oil and gas platform technology and wind turbines. This means we can move into deeper waters with higher wind speeds and less visual impact. With 80% of the world's wind resource in water deeper than 60 meters (the current maximum for fixed offshore wind) floating wind is set to become a key technology in reaching Net-Zero and delivering the 100GW of offshore wind recommended in the recent Climate Change Committee's Sixth Carbon Budget.

Independent studies have suggested there could be as much as 50GW of electricity capacity available in the Celtic Sea waters of the UK and Ireland which is a significant low carbon resource at a UK level. This will allow Wales to maximise the estimated job creation of 17,000 UK jobs generating £33.6 billion for the UK economy by 2050.²

Floating Wind is predicted to reach subsidy free levels by the early 2030's.³

Economic Benefits and a COVID Green Recovery

There is a tangible opportunity for the Welsh Government, Local Governments, LEPs and the UK Government to work together to deliver and implement the policy and infrastructure changes needed to deliver a long-term pipeline of sustainable, home-grown projects in Welsh waters of the Celtic Sea. This will create an industry that could also export to Ireland and further afield as the sector develops internationally. A report by the Offshore Renewable Energy Catapult (OREC) focusing on supply chain opportunities, produced for the Welsh Government and the Cornwall and Isles of Scilly Local Enterprise Partnership, identified that floating offshore wind projects in the Celtic Sea could support 3,200 jobs in South West England and Wales and bring £682m in benefits to the local supply chain by 2030 for the first GW of deployment⁴.

¹ https://ore.catapult.org.uk/wp-content/uploads/2018/10/PN000244-FWMS-Report_FINAL-1.pdf

² https://ore.catapult.org.uk/wp-content/uploads/2018/10/PN000244-FWMS-Report_FINAL-1.pdf

³ <https://ore.catapult.org.uk/press-releases/uk-floating-offshore-wind-subsidy-free-2030/>

⁴ <https://www.marineenergywales.co.uk/wp-content/uploads/2020/01/Benefits-of-Floating-Offshore-Wind-to-Wales-and-the-South-West.pdf>



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OREC produced results from similar, project-scale, analysis in 2021 stating the Erebus project would support up to 1100 Full-Time Equivalent (FTE) job-years during construction and 73 long-term jobs annually during operation. Furthermore, Erebus would generate £182m in GVA from CAPEX and £9m annually from OPEX for the local and UK economy.

The Committee should look to examine how the economic development opportunities brought by floating offshore wind projects can be maximised with regards to Welsh supply chains and jobs.

Ministerial Priorities for the Next Twelve to Eighteen Months

Blue Gem Wind welcomes the Ministerial commitments to renewable energy generation, in particular its developing marine energy programme, assuming Floating Wind is part of the marine energy programme.

Infrastructure Investment

We agree with the Minister's assessment that 'infrastructure investment provides an important and much needed stimulus' and believe that this should be a high-priority in this term for the Welsh Government. In order to achieve this, it is critical that Ministers work with the UK Government to design the most appropriate investment scheme that facilitates supply chain growth and brings jobs.

- **Examine the economic development potential brought by floating offshore wind in the Celtic Sea and make recommendations to the Welsh Government on the actions required around port infrastructure investment that will facilitate supply chain growth.**

A key focus of the Committee should be to scrutinise the action by the Welsh Government in cooperation with the UK Government in the area of supply chain development and support. This should focus on port upgrades to ensure that the ports are fit for purpose for floating wind. It is understood that the £160m funding being invested by the UK Government port infrastructure for offshore wind is destined for the east coast of England but further port investment should be encouraged for the Celtic Sea ports through subsequent rounds.

There is the opportunity for a collaborative approach to a port strategy in Wales to support renewables and the Economy, Trade and Rural Affairs Committee should seek to work possibly in conjunction with the Climate Change, Environment, and Infrastructure Committee to understand the potential for co-investment in ports between Welsh and UK Governments.

This collaborative approach has proved successful for the recent Pembroke Dock Marine project as



Blue Gem Wind

part of the Swansea Bay City Deal. The role ports will play in local supply chain benefits cannot be overstated and currently there are challenges for Welsh ports to support, in particular, the fabrication and integration of platforms and wind turbines due to the scale and development of floating wind.

Blue Gem Wind's projects could potentially add significant value and de-risk Government investment in Pembroke Dock Marine but to maximise the opportunity to Wales more port infrastructure investment is required and a careful examination of the barriers to this will be useful in maximising the economic development opportunities.

Stimulating Marine Energy Generation

In order to ensure that floating offshore wind projects in the Celtic Sea are able to play their part in the Welsh Government's ambition for renewables to generate an amount equivalent to 70% of Wales' electricity use by 2030 and create jobs and investment opportunities alongside, Blue Gem Wind recommends that Ministers and your Committee:

- **Engage with The Crown Estate (TCE) to ensure that opportunities for 'early commercial stepping stone' floating offshore wind projects in the Celtic Sea are delivered through a timeous leasing framework for generation up to 300MW in output. Once this 'early-commercial' leasing framework is complete, a floating wind commercial scale leasing process should be progressed as soon as possible otherwise Wales will be disadvantaged vis a vis with Scotland who already have a commercial scale leasing round for floating wind and 2 floating wind projects fully commissioned.**

Seabed leasing and site security provided by The Crown Estate are vital to providing confidence to investors in floating offshore wind. The success of projects in the Celtic Sea is based upon a stepping-stone approach, whereby projects and the associated supply-chain are able to gradually scale-up, starting at ~100MW, moving to ~300MW, before taking on full-scale commercial projects. At present, The Crown Estate (TCE) provides a leasing mechanism for 100MW which Blue Gem Wind has used for its first site, Erebus (96MW). After this, there is currently no live process for floating wind projects to achieve a seabed lease in Welsh or English waters.

Encouragingly TCE launched a call for evidence in December 2020 for "early-commercial sites". This was followed by an announcement in March 2021 that The Crown Estate will be commencing work to create a new leasing framework for early commercial-scale floating offshore wind projects in the Celtic Sea up to 300MW in output. Ministers should be focused on highlighting the importance of timeous decision-making by TCE and value brought by effectively supporting the stepping-stone approach.

Blue Gem Wind Ltd.

Company registered in England and Wales.

Company Number: 11116383.

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Pembroke Dock, Wales, SA72 6UN



Blue Gem Wind

- **Engage with the UK Government to ensure that the Contracts for Difference (CfD) scheme incentivises the use of local supply chain strategies and maximises the economic benefit to Wales.**

For floating offshore wind, revenue support will be required for at least the next ten years and we have supported the UK Government's decision to include floating wind in CfD Pot 2 along with other small scale or innovative technologies from Allocation Round 4 onwards. We believe that the Department for Business, Energy and Industrial Strategy has all the required capabilities being able to set pot capacities, create minima and maxima and use Administration Strike Prices (ASPs) to ensure the delivery of project at suitable value for money but it is important this is done in the context of a local supply chain strategy.

The two Blue Gem Wind projects will be, it is believed, each competing with similarly sized projects in Scotland. Wales and Scotland are keen to build up their supply chains for FLOW and it is important that the CfD competition in Allocation Round 6 (2025) is not set so that only one project and thus one region can be successful. The Welsh Government should be focused on maximising the economic value brought to Wales by FLOW through its supply chains and it is critical that Ministerial engagement around future revenue support system design takes place with this in mind.

Other areas for consideration

Grid will require significant investment and strategic planning and could be a barrier to maximising the economic opportunities for Wales. Planning and NRW's role in providing timely consent decisions is also critical for Wales. Skills, training and diversification for a new floating wind sector is essential to capturing the economic benefits

We would welcome the opportunity to present in more detail the case for port infrastructure investment and supply chain contribution to economic development at any oral evidence sessions which result from this call for evidence. Should you have any questions, or wish to discuss the contents of this response, please contact david.jones@bluegemwind.com

Agenda Item 4

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Blaenoriaethau ar gyfer y Chweched Senedd / Priorities for the Sixth Senedd
PR80
Ymateb gan RSPB Cymru / Evidence from RSPB Cymru



RSPB Cymru submission on Priorities for the Climate Change, Environment and Infrastructure Committee

10 September 2021

RSPB Cymru is grateful for the opportunity to provide input to the Committee's planning for the next 12-18 months. As the Chair and members of the Committee are well aware, we are at a critical moment for Wales, and the world, to respond to the climate and nature emergency. The decisions made by the Welsh Government and the Senedd in the coming months and years will determine whether Wales succeeds or fails in turning around biodiversity decline and delivering our net zero target.

[The global agenda: COP15 and COP26](#)

The two forthcoming global summits – COP15 of the UN Convention on Biological Diversity (CBD) and COP26 of the UN Framework Convention on Climate Change - provide a strong frame for the Committee's agenda, and no doubt the Committee will wish to give attention to these key moments – and the resulting new global agreements – and the Welsh Government's input and response.

The world's leading biodiversity and climate experts articulated a key challenge earlier this year. The [joint report published by IPBES & IPCC](#) states that biodiversity loss and climate change are both driven by human economic activities and mutually reinforce each other. Neither will be successfully resolved unless both are tackled together. There are many potential win-wins in tackling climate and nature together, but narrowly-focused actions to combat climate change can directly and indirectly harm nature, and vice-versa.

[Welsh Government Well-being Objective to embed response to climate and nature emergency](#)

The Welsh Government has [committed](#) to “embed our response to the climate and nature emergency in everything we do”. This objective clearly applies across all government departments, and we would encourage the Committee to consider how it might support and scrutinise Welsh Government in its delivery of this objective, and/or support other Committees in doing so. Delivering on this objective must not be limited to considering how to *avoid or mitigate harm* to biodiversity in departmental priorities, but also how to *contribute to (and invest in) nature's restoration and recovery*. We believe this is less well-developed across Welsh Government than is the practice of considering decarbonisation targets, (we consider the development of legally binding nature recovery targets will support this integration in the longer term).

Consideration of this objective could usefully help to frame the Committee's consideration of the Welsh Government budget, deep dives undertaken by Ministers, and initiatives developed as part of a green recovery.

Legislation on environmental governance, principles and nature recovery targets

We were delighted by the support shown for the recent [Senedd motion](#) declaring a nature emergency, which also called for parity between Welsh Government actions to tackle climate change and biodiversity loss. Many Senedd members spoke during the debate with passion and conviction about the need to do more for nature. We were also pleased that the CCERA Committee [Fifth Senedd Legacy Report](#) contained a clear recommendation underlining the importance of nature recovery targets.

The Minister has indicated her intention to bring forward an environmental governance bill which would also provide a potential vehicle to set the framework for legally binding nature recovery targets; a prospect we warmly welcome and support.

We are, however, concerned that this Bill did not feature in the legislative programme for Year 1 of the Senedd term, and that the Minister has offered no guarantee that time will be found in Year 2. Wales has fallen well behind the rest of the UK on environmental governance, resulting in a *de facto* weakening of environmental protection post EU exit. It is vital that the legislation to close this gap is prioritised by Welsh Government and allocated the resources necessary to bring it forward early in the second year of the Senedd. We would urge the Committee to seek regular updates from Government on this matter.

We also see no reason to delay legislation (via the same Bill) that would set a framework for nature recovery targets. The Minister has indicated she is keen to first see the post-2020 global biodiversity framework. While we agree that Wales' targets must take account of this, it is both possible and important to progress work on the Welsh primary legislation before the conclusion of negotiations. As one of the [world's most nature-depleted countries](#), it is clear that Wales must be prepared to lead by setting strong domestic ambition. (While the Ministers' submission refers to the Nature Recovery Action Plan it is important to note that this plan does not include any SMART targets or compel specific actions, nor do we consider it has a reach beyond the nature/land use focused government departments).

As set out in the RSPB Cymru / WWF Cymru report '[Putting Wales on Path to Nature Recovery](#)', Wales should move ahead immediately with setting a high level framework for targets in primary legislation, with a detailed suite of SMART long term and interim targets to follow in secondary legislation. We believe the primary legislation should include an overarching new duty on the Welsh Government to halt and begin to reverse the loss of biodiversity by 2030 (aligning Wales with the [G7 2030 Nature Compact](#)) and achieve substantive recovery by 2050.

Additionally, we note that commitments to protect 30% of land and sea for nature by 2030 (the 30x30 target) have been made by UK, Scottish and Northern Irish Governments, but we have not yet seen a formal commitment from the Minister to achieving this in Wales.

Green recovery

The [Dasgupta Review](#) into "The Economics of Biodiversity" describes nature as our most precious asset, and calls for [transformative change in how we recognise and value nature](#). A recent RSPB Report shows the **significant return that can be gained from investing in our natural assets: [for every £1 invested in peatland, salt marsh and woodland respectively can secure £4.62, £1.31 and](#)**

[£2.79 in return](#). Moreover, RSPB Cymru has estimated that an investment in nature restoration could support almost [7,000 direct FTE jobs in Wales](#).

Tackling the nature and climate emergency will require coordinated attention across committees, and we would encourage the CCEI Committee to revisit [recommendations made by the previous Economy, Infrastructure and Skills committee](#) in November 2020 (ideally in tandem with the current ETRA Committee), including the recommendations to “**invest in a transformation green recovery**” through:

- **Investment in and acceleration of ‘shovel-ready’ green infrastructure.** This refers to **nature-based solutions** such as peatland, salt marsh or woodland outlined above. Large scale habitat restoration is necessary to support adaptation to climate change as well as contributing to mitigation, and to reversing biodiversity loss. Peatland restoration is particularly important due to potential emissions from degraded peat (whereas peat habitats in good condition help to sequester carbon, as well as providing other ecosystem services).
- Skills funding to support green jobs and “take robust action to analyse and address the disparities between current and future needs and existing skills provision”. This could, in part, be fulfilled by an **investment in a National Nature Service** as proposed to Welsh Government by the NRW Green Recovery Delivery Group.

When coupled with investment in nature’s restoration, a National Nature Service will further assist a just transition into green jobs for the future, while ensuring that nature remains at the heart of a green and just recovery.

[The importance of robust planning for decarbonisation in harmony with nature](#)

In tandem with demand reduction and nature-based solutions, the need to rapidly decarbonise the energy system is well understood. Robust and accountable land- and sea- use planning are essential to enable this transition to take place in a way that does not exacerbate the crisis of biodiversity loss. Potential impacts to ecosystems from development include wildlife collision, disturbance, habitat loss, and loss of access to preferred foraging areas (displacement). The Minister has spoken of some of the difficult choices that lie ahead (for example in her July statement on the [Gwent Levels](#)), but it is imperative that robust, forward looking development plans are utilised to their full potential to enable decision makers to make the best, strategic choices with the best possible understanding of opportunities and impacts.

Strategic spatial planning is essential to:

- establish the capacity for development within an area;
- guide the siting of developments away from the most ecologically sensitive areas;
- assess and minimise the cumulative impacts on habitats and species;
- identify and secure opportunities for net biodiversity benefit;
- in doing the above, provide greater certainty (in terms of deliverability of renewable energy projects) to developers and other sectors.

We would welcome consideration of marine planning by the Committee, an area which has relevance across the breadth of the Committee’s remit. During the consultation on the draft Welsh National Marine Plan (WNMP), the former Climate Change, Environment and Rural Affairs Committee held a **one-day workshop** on this. Since the WNMP was developed, ambitions for development (particularly renewables) in Welsh seas have grown significantly. While it is encouraging to see the Ministers’ comment (in their letter to the Chair of 30 July) that effective

marine planning and regulation is crucial for sustainable marine sector growth, particularly marine renewable energy, it must be urgently noted that the WNMP is not currently fit for this purpose. The WNMP does not have a spatial component or development control policies, and therefore does not embed strategic forward planning or seek to proactively address conflict.

We therefore believe a follow-up session on marine planning is timely and urgent (a similar format to the previous workshop would work well). The marine environment is not currently resilient and a [recent evaluation](#) shows that the status of some species, such as seabirds, is worsening. As Welsh seas become more crowded, we believe the marine planning system must operate at a strategic and spatial level to ensure that marine development ambitions are delivered in a way which does not further hinder the achievement of [Good Environmental Status](#).

While the terrestrial planning system is a world away from the WNMP, and much more focused on spatial allocation from national through to local level, it is still the case that developments of national significance come forward outside of this context so that overall capacity and cumulative cross sector impacts are not assessed at a strategic level. As in the marine environment this leads to a higher likelihood of dispute over developments in ecologically sensitive areas (including designated sites); concerns over cumulative impacts; and higher uncertainty for all parties.

The development of a robust, regulated approach to securing **net biodiversity benefit from development** would present an opportunity to secure funding for nature's recovery, and would merit the Committee's attention.

[Investment in nature delivery](#)

In recent years we have seen a welcome uplift in the budget allocation for designated sites, and the Welsh Government's new Nature Networks programme is continuing to move this agenda in a welcome direction by considering multi-year funding for much needed action to improve the condition of our designated sites and the wider ecological networks they are a part of. This notwithstanding, it is clear that the anticipated funding is much lower than what is needed – for example, in 2015, an [EU LIFE funded report published by NRW](#) estimated that the actions needed to attain favourable conservation status of Wales' Natura 2000 sites would cost £144 million to 2020 (noting that this figure does not include staff time or ongoing, currently funded (at the time) management work).

A critical part of putting nature conservation funding on a more sustainable footing will be clarifying the connections with other Welsh Government policies – for example, the new Sustainable Farming Scheme and the National Forest.

However, there is no escaping the fact that Natural Resources Wales has received a budget cut in real terms of 35% between 2013 and 2020¹. It is deeply concerning that around 50% of terrestrial protected site features are in unknown condition as cuts have left NRW unable to monitor these most important places for nature². Fewer than 6% of SSSIs have a management agreement in place involving NRW. NRW resourcing must be scaled up urgently in recognition of the scale of the challenge that we must meet to halt and reverse biodiversity loss.

¹ According to Emma Rose (Unchecked UK) 2021 report [Safeguarding Standards – Why Wales should lead the way](#)

² <https://naturalresources.wales/evidence-and-data/research-and-reports/protected-sites-baseline-assessment-2020/?lang=en>

We note that Natural England is now receiving a 47% increase in Government funding after the Chair of Natural England [stated](#) to the Environmental Audit Committee that budget cuts had left the agency's funding "below the level required to deliver all of our statutory duties to a good standard". While the increase to Natural England's budget still leaves it with less funding than it received in 2008/09, it is at least some recognition that years of underinvestment must be reversed for agencies to be able to deliver their statutory duties.

There is no doubt that financing nature's recovery will need to involve innovative approaches enabling private sector investment; but Welsh Government must also face the need to increase public investment in the resources (including human resources) needed to deliver this successfully. We would urge the CCEI Committee to bring these considerations into its work around the Welsh Government budget.

[Work with other Committees](#)

While we appreciate the CCEI Committee's remit is very broad, there are key policies linked with addressing climate change and nature loss that sit outside of it. For example, development of a National Nature Service (as referenced above) would entail commitment from the Economy Department with scrutiny by the Economy, Trade and Rural Affairs (ETRA) Committee, but would benefit from the CCEI Committee's expertise in nature and climate action.

Fisheries and farming are two further priority areas which are critical to nature's recovery and where joint working between the CCEI Committee and the ETRA Committee may be advantageous, in particular on:

- **The Joint Fisheries Statement (JFS) and Fisheries Management Plans (FMPs)** under the 2020 UK Fisheries Act **which will set out post Brexit fisheries management in Wales. There is a requirement, within the Act to lay a consultation draft of the JFS before the appropriate legislature. This is expected in early 2022.** Given the significance of the JFS for determining long-term fisheries management policies, Committee scrutiny will be of the utmost importance.
- **The Agriculture (Wales) Bill and Sustainable Farming Scheme.** The introduction of a new Agriculture Act for Wales provides a unique opportunity to transition to and reward sustainable farming and land management that restores nature, tackles climate change and provides society with a wide range of essential public goods. This piece of legislation will play a critical role in determining the state of Welsh ecosystems on which we and future generations depend.

For further information, please contact Annie Smith – annie.smith@rspb.org.uk

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Blaenoriaethau ar gyfer y Chweched Senedd / Priorities for the Sixth Senedd
PR81

Ymateb gan Y Gymdeithas Cadwraeth Forol / Evidence from Marine Conservation Society



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The Marine Conservation Society (MCS) welcomes the opportunity to feedback to the Climate Change, Environment and Infrastructure Committee (hereafter “the Committee”) on priorities for the Sixth Senedd term (2021-2026).

MCS is the UK’s leading marine conservation charity. We work to ensure our seas are healthy, pollution-free and protected. Our vision is for seas full of life where nature flourishes and people thrive. We have actively been working in Wales to improve the health of Welsh seas for the past 30 years.

Summary of recommendations for the next 12-18 months

Marine Energy:

- Investigate how marine development can occur without causing irreversible environmental damage

Net Zero:

- Explore the design, implementation and funding of a National Blue Carbon Recovery Plan

Nature and Biodiversity:

- Scrutinise the designation and management of Wales’ Marine Conservation Zone process
- Co-inspect the UK Joint Fisheries Statement and Fisheries Management Plans alongside the Rural Affairs Committee once available

Circular Economy:

- Hold Welsh Government to account on timelines and implementation of an all-inclusive Deposit Return Scheme and Single-Use Plastic bans
- Ensure full alignment with EU REACH regulations, including restrictions on intentionally added microplastics, PFAS in non-essential uses and other harmful contaminants

Tackling Climate Change in harmony with nature: Marine Spatial Planning

“Effective marine planning for, and regulation of, new development is crucial to enabling sustainable marine sector growth, particularly for the development of marine energy projects to contribute to net zero.” - Minister for Climate Change on the Welsh Government priorities, July 2021

We welcome the Welsh Government’s ambition to deliver renewable energy to the equivalent of 70% of Welsh homes by 2030. We note the ambition for the growth of marine renewable energy to meet these commitments. Whilst it is true that marine renewable energy will have a key role to play

in the move away from Wales's dependency on fossil fuels, development of this type of energy is not without its challenges - particularly, avoiding destruction and disturbance to marine life and the habitats on which they depend. We cannot allow the need for marine renewable energy to exacerbate the nature emergency we are experiencing in Wales.

We recommend that the Committee considers investigating how the ambition for marine renewable energy in Wales can be realised without causing irreversible damage to Marine Protected Areas.

Tackling Climate Change in harmony with nature: Blue Carbon

"... we also need to understand what the seas already deliver for us in terms of carbon sequestration and to enhance that where we can, and to stop degrading it in ways which are utterly unnecessary." - Minister for Climate Change, MCS Sensational Seas Event, June 2021

It is encouraging that the Minister recognises the importance of our blue carbon habitats in sequestering carbon. In order to meet the ambitious target to becoming carbon net-zero by 2050, it is critical we look towards the ocean and its immense carbon storing capabilities. An NRW-commissioned report in 2020 revealed that blue carbon habitat in the Welsh National Marine Plan area presently stores at least 10 years' worth of Wales' carbon emissions. Not only do these habitats act as effective carbon stores, but equally are efficient at absorbing storm energy; thus, acting as a natural flooding solution.

We recommend the Committee explore the development, implementation and funding of a National Blue Carbon Recovery Plan designed to maintain and enhance our invaluable marine blue carbon habitats.

Restoration and protection of one of Wales's most important natural assets – the marine environment

"Our vision for our seas is that they are clean, healthy, safe, productive, and biologically diverse. Wales has important marine habitats, such as seagrass forests and saltmarshes. Our approach is structured around assessment, protection and management, and restoration." - Minister for Climate Change on the Welsh Government priorities, July 2021

We welcome the Minister's continued commitment to seas that are "*clean, healthy, safe, productive and biologically diverse*" (a commitment made by all four UK nations within the UK Marine Policy Statement, 2011). Given that the Minister does not elaborate on priorities here, we thought it would be useful to set out our priorities for the Committee:

We recommend that the Committee scrutinises the identification, designation and management of the Marine Conservation Zones process in Wales over the next 12 months. The process of identifying sites is already severely delayed in Wales.

The Committee should work with the Rural Affairs Committee to consider scrutinising the UK Joint Fisheries Statement and the Fisheries Management Plans once these are made available.

Moving towards a Circular Economy – introducing waste reduction legislation

“The government has committed to bringing forward legislation to ban more single use plastics however the implications the Internal Market Act 2020 might have on these proposals is not yet clear.” - Minister for Climate Change on the Welsh Government priorities, July 2021

The introduction of key legislation such as an all-inclusive Deposit Return System (DRS) and bans on single use plastic items has been significantly delayed for a number of years. While we appreciate the complications that might be posed by the Internal Markets Act, Wales cannot afford to delay further in the face of a Climate and Nature Emergency.

“Maintaining and enhancing our dynamic water ecosystem is central to tackling the wider strategic challenges we face. We need to ensure our drainage and sewerage systems are sustainable, managed effectively and that they are fit for purpose in terms of meeting changing demands.” - Minister for Climate Change on the Welsh Government priorities, July 2021

We welcome the Minister’s recognition that effective management of drainage and sewage systems is fundamental in protecting our water ecosystems – both freshwater and marine. To ensure that drainage and sewage systems are “sustainable”, contaminants must be prevented from entering wastewater systems at source. For additional information, please see our recently published [sewage sludge paper](#).

Additionally, a clean and safe circular economy must be free from harmful chemicals such as PFAS. As [summarised by the UK Government](#); “PFAS are a group of over 9,000 different chemicals, some of which are already banned or highly restricted. In industry, these substances are used as stain repellents, coatings and fire-fighting foams. The chemicals in PFAS are extremely persistent in the environment; the substances can accumulate in animals and can also be toxic this means PFAS are of growing concern for both human health and environmental reasons.” A truly circular economy cannot be achieved while chemicals such as PFAS continue to accumulate in our environment.

We recommend that the Committee holds Welsh Government to account on timescales for the introduction of much-delayed and much-needed legislation on an all-inclusive Deposit Return System and bans on single use plastic.

The Committee should work with Welsh Government to keep fully aligned with EU REACH regulations, including restrictions on both intentionally added microplastics and PFAS in non-essential uses amongst other harmful contaminants.

Thank you again for the opportunity to provide the above comments. If you have any further questions with regards to our feedback above, please do not hesitate to contact me.

Yours sincerely,

C. Trotman

Clare Trotman Policy and Advocacy Manager (Wales)

Marine Conservation Society



Introduction

Thank you for the opportunity to submit views to the Committee on its priorities for the Sixth Senedd. In establishing the new Ministry for Climate Change Environment and Infrastructure the First Minister [committed](#) to putting the environment, biodiversity and climate change at the heart of decision making. Whilst we recognise that the [paper](#) outlining the Minister and Deputy Minister's portfolio priorities for the next 12 – 18 months sets out a series of focus areas and not necessarily a comprehensive schedule, it does omit key areas of work.

Nature and climate emergency

Wales Environment Link welcomed the Senedd declarations, backed by the Welsh Government, of first a climate emergency and, more recently, a nature emergency. The role of this Committee, and of this Senedd, in setting the course to ensure Wales' response is ambitious enough to address this challenge, could not be more critical, and the ongoing work towards new global agreements on climate change and biodiversity provides critical context for the Committee in determining its priorities.

In June 2021, [IPBES & IPCC published a joint report](#) based on a [workshop](#) bringing together the world's leading biodiversity and climate experts. The report states that biodiversity loss and climate change are both driven by human economic activities and mutually reinforce each other. Neither will be successfully resolved unless both are tackled together. Further, while there are many potential win-wins in tackling climate and nature together, narrowly-focused actions to combat climate change can directly and indirectly harm nature and vice-versa. Examples of climate change measures that have potential to harm nature are planting trees in inappropriate places; monoculture afforestation; and poorly located renewable energy infrastructure.

The Welsh Government's commitment to integrating the response to the climate and nature emergency across all activity is very welcome. This Committee will have an important role to play in ensuring this is effectively delivered, and that nature recovery as well as climate objectives are mainstreamed across government.

Reviewing environmental law, Natural Resources Wales and regulatory bodies

In recent evidence sessions at the Senedd the Minister for Climate Change Julie James MS confirmed that the Welsh Government is undertaking a "review of where regulatory bodies sit together – Welsh Government, Natural Resources Wales, local authorities and various other statutory bodies". Presumably this follows calls from the Welsh local government association to review the functions of NRW specifically in relation to flood management. During the [JLC Committee 120721](#) the Minister also stated that Officials had been asked to "scope out a possible review of environmental law in Wales." Although no further details of these reviews are available and therefore their scope remains unclear, these are potentially significant areas of work that should be of interest to the Committee. In this context we note that the Senedd has not to date undertaken post legislative scrutiny of the Environment Wales Act 2016, which created a new statutory purpose for Natural Resources for Wales and the statutory framework for the sustainable management of natural resources. Scrutiny of the implementation of the EWA and that of NRW's broader statutory duties and functions is key to determining whether the intended environmental outcomes are being achieved. It would therefore seem timely to consider this as part of the CCEI Committee's priorities for the Sixth Senedd, alongside the reviews announced by the Minister.

Environmental governance post Brexit – interim and longer term arrangements

The letter outlining the Minister's priorities makes minor reference to the interim environmental governance arrangements and ongoing work with stakeholders to develop permanent arrangements. There are a number of matters relating to environmental governance and principles that require the Committee's consideration.

An environmental governance and principles bill

The previous Welsh Government had [committed](#) to “take the first proper legislative opportunity to enshrine environmental principles into law and close the governance gap” back in 2018, with First Minister Mark Drakeford stating that the Welsh Government “*will also bring forward an environmental principles legislation during the next Assembly term, if we’re in a position to do so*” in the [legislative statement](#) on the 15th of July 2020. The intention was to bring forward an environmental governance and principles bill in the Sixth Senedd, with the previous Minister Lesley Griffiths MS committing in November 2020, to continuing to work with the stakeholder task group with the aim of bringing forward a White paper on the permanent (statutory) arrangements after the Senedd election in May. It was also [stated](#) at the time that further steps may be taken to strengthen the interim arrangements, alongside the development of a shadow body ahead of the legislation being laid and establishment of the new body in law.

In evidence sessions on the Environment Bill LCM at the [Legislation, Justice and Constitution Committee on the 12th of July 2021](#) and the Climate Change Environment and Infrastructure Committee on the 15th of July, the Minister for Climate Change Julie James MS clarified a number of points in relation to proposals for an environmental governance and principles bill for Wales, and the existing non statutory interim arrangements introduced on the 1st of January this year.

During the CCEI Committee 150721 the Minister confirmed that “the environment principles and governance Bill isn't in the year 1 programme” and that the Welsh Government was working towards a bill “hopefully in year 2” but that she was “not in a position to promise” that it would be included in year 2. The Minister explained that she had to “negotiate with Government colleagues” and go through the “normal Government process for putting forward Bills from your portfolio” but that there was “only so much space in the legislative programme”.

There appears to be a shift in priority given to bringing forward legislation necessary to establish environmental governance arrangements and principles in Wales post Brexit, in contrast to previous commitments made. This is of major concern to WEL members. Wales is well behind the other UK countries in the establishment of domestic measures to address the governance gap, resulting in weakened environmental protection in spite of the recognised nature and climate emergency.

We note that the Minister spoke of the environmental principles and governance Bill as a potential vehicle for nature recovery targets – we welcome and support this, as set out in more detail below. We would emphasise that delay beyond the second year of the Senedd is not acceptable, and that there is no reason that a framework for statutory targets cannot be developed in line with this timetable.

Environmental Principles – Interim approach

In the absence of legislation, the Welsh Government is currently developing non statutory guidance on the application of environmental principles. This guidance is not subject to public consultation and the timetable for its introduction is unclear.

The EU-UK Trade and Cooperation Agreement (TCA) and environmental governance

The EU-UK Trade and Cooperation Agreement (TCA) contains sector specific environment and climate change commitments as well as a number of provisions intended to maintain high environmental standards. Whilst this is the responsibility of the UK Government, the absence of environmental governance arrangements in Wales is notable and requires consideration.

Interim governance arrangements and the role of the Interim Environmental Protection Assessor Wales (IEPAW)

In the absence of legislation, non statutory interim environmental governance arrangements were phased in from the 1st of January this year. Initially this included a web page, followed by the appointment of the Interim Environmental Protection Assessor Wales in March. The interim arrangements are intended for up to two years “during which time the Welsh Government will develop a permanent environmental governance oversight body, allowing for a period of transition from the interim to the new arrangements”. To meet this timeframe it is essential that a Bill should be brought forward in the second legislative programme.

Whilst we welcome the appointment of the IEPAW, the role of the Assessor as it stands is to consider matters relating to the functioning of environmental law rather than a complaints mechanism for

breaches of environmental law by public bodies. As such the role of IEPAW does not address the governance gap that arose when the UK left the EU at the start of the year.

The role of the Senedd in existing and longer term environmental governance arrangements

As WEL has highlighted [previously](#) the role of the Senedd in the interim and longer term governance arrangements is yet to be considered in detail. Initial discussions between the Trefnydd and Presiding Officer had been scheduled to take place in early 2021. The Chair of the CCERA Committee [wrote](#) to the Presiding Officer in December 2020 asking for clarity on the practical operation of the complaints system and the identifying the need to attach Welsh Parliamentary Commission resources to support emerging Parliamentary procedures. It remains unclear what progress if any has been made in this regard.

Statutory Nature Recovery Targets

Wales Environment Link strongly supports conclusion 26 of the Legacy Report of this Committee's predecessor in the fifth Senedd:

Conclusion 26. This Committee firmly believes that the next Welsh Government should introduce targets to arrest the decline and restore biodiversity. We believe our successor Committee should ensure the Welsh Government prioritises this matter during the first year of the next Senedd term.

The Sixth Senedd has, of course, already expressed its view on this, on 30 June this year, passing a resolution that formally declared a nature emergency and called on the Welsh Government to: "Introduce legally binding requirement to reverse biodiversity loss through statutory targets." This motion was supported by Welsh Government and the Minister has since spoken of her intention to bring forward an environmental governance Bill that could also provide a means to legislate for nature recovery targets, which we strongly welcome.

WEL Members were concerned, however, by the comments made by the Minister to this Committee on 15 July, that suggest that this legislation may not be given a slot even in the second year of this

Senedd. Furthermore, the Minister expressed a concern that developing statutory targets might hold up a governance bill. In our view there is no reason that the legislation for nature recovery targets cannot be produced in good time for a second year bill; and as stated above, further delay to governance legislation is unacceptable.

As set out in [Putting Wales on a Path to Nature Recovery](#), published by RSPB and WWF with the support of WEL in June 2021, the Bill should introduce key high-level duties that would not be time-intensive to bring in: a duty to halt and begin to reverse the loss of biodiversity by 2030 and achieve recovery by 2050; and a duty to set SMART long term and interim targets via secondary legislation, informed by independent expertise and scientific advice, and by the post-2020 CBD framework. These must be supported by a legal requirement on Ministers to ensure that the targets are met.

Putting Wales on a Path to Nature Recovery sets out a comprehensive case for long-term and interim statutory nature targets based on evidence including examples from other areas of policy and from approaches taken internationally. The Westminster Environment Bill will introduce a framework for legally binding biodiversity targets for England.

While there will be a need for alignment between domestic targets and the Post 2020 Global Biodiversity Framework that will be finalised in Spring 2022, there is no reason to wait until a final framework is agreed and published to start setting ambitions for Wales. The direction of travel is already clear, not only from the recent draft published by CBD but also from recent agreements including the [Edinburgh Declaration](#), the [Leaders' Pledge for Nature](#), and the [G7 2030 Nature Compact](#). Wales is [among the most nature-depleted countries in the world](#) and must be prepared to show leadership by acting swiftly on this agenda.

This is a win-win situation. Many of the actions that we need to take to protect and restore wildlife will also serve as nature-based solutions to flooding, soil erosion and water and air pollution and also help capture carbon to reduce net greenhouse gas emissions. The joint IPBES & IPCC report published in June 2021 made clear that neither climate change nor biodiversity loss can be successfully resolved without tackling both together. It also highlighted the potential for narrowly-focused action on climate to be damaging for nature, and vice versa. This underlines the need for nature recovery, as

well as climate, to be taken into account across Government decision making at all scales; statutory nature recovery targets will be key to ensuring this happens.

Climate and Biodiversity Education

The majority of climate related priority areas outlined in the Minister's letter are focussed on infrastructure and technology. Whilst welcome, we would urge that this area also needs to include the engagement and education of the people of Wales. Whilst climate awareness is growing, the skills and knowledge required to provide solutions for the future are currently limited. Outside of the more widely understood areas of car driving and energy efficiency, there is a significant lack of knowledge as to what people can do to tackle climate change through individual and everyday choices. It is evident that Environmental Education is needed for adults, as well as young people and children and we should not assume that there is a broad level of understanding across the population as to what can be done or what needs to be done to take action.

Keep Wales Tidy, through the Eco-Schools Programme, and Size of Wales have been delivering environmental education for a number of years and have recently undertaken a number of successful training programmes with teachers. This training was well received but both charities have highlighted the current lack of understanding of environmental challenges, including climate change, biodiversity loss, pollution and over-consumption. RSPB Cymru's report [Every Child Outdoors Wales](#) outlines an "extinction of experience", a phenomenon where children are having less experiences in nature than ever before in history, and the impacts that this nature deficit can have on their development. Whilst there is significant support for the need to teach these issues, and pupil led learning is directing educators to engage in these issues, in many cases, there is a gap in the skills, knowledge and confidence to effectively engage learners.

The Future of Food, Farming and Land Use in Wales

In the Minister Julie James' letter to the committee outlining Welsh Government's priorities in relation to climate change, environment and infrastructure, we noted that the letter did not specifically refer to the key role that the food and farming sector needs to play. Importantly, it's worth recognising that our food system is at risk from a changing climate. It also directly contributes towards climate change, with agriculture contributing around 16% of Wales' total greenhouse gas

emissions. Based on UK data, food manufacture, transport and retail emissions account for another 5.5%. Furthermore, unsustainable land use is one of the key drivers of biodiversity loss, with more than 80% of Wales' land utilised for agriculture. Crucially, our land is our biggest natural defence against climate change and it could be our biggest ally in restoring nature. We therefore believe that this committee has to consider within its priorities the crucial role of food and farming (from farm to fork – production to consumption), and land use.

The Legislative Programme confirmed that the Government plans to bring the Agriculture Bill to the Senedd in this Senedd year. This critical piece of legislation will shape our landscapes, ecosystems and rural communities for many years to come. Ecological resilience, food production and the long-term viability of farming in Wales as interdependent; a healthy environment underpins food production itself. The Agriculture Bill must respond to the triple challenge of delivering high quality sustainable food whilst restoring nature and getting to carbon net zero. The recent IPCC report adds significant context to this ambition and the Government will have to consider the new data and advice contained in the report closely alongside its work on the Bill. With this in mind, joint scrutiny of the Agriculture Bill and proposed Sustainable Farming Scheme by the Climate Change, Environment and Infrastructure Committee with the Economy, Trade and Rural Affairs Committee would be appropriate.

Net zero - Low carbon delivery plan and 2nd carbon budget

We agree with the Minister on the need for the 2020s to be 'the decade of action' if we are to meet net zero by 2050. We also agree of the importance of the second Low Carbon Delivery Plan and carbon budget in working towards this 2050 objective. Given the new commitment to a 2050 net zero target, we want to see a tightening of targets and transparent, timebound pathways towards identifying them, particularly clear detailed pathways for agriculture and land use. We also want to see scope 3 emissions accounted for in carbon budgets. We appreciate that it is a challenging aspect to measure but feel that it is vital for countries to ensure that this element is included if we are to have a realistic chance of meeting targets set in the Paris Agreements. By including scope three in Welsh Government targets, we would also be setting the challenge for other UK and global governments to fully consider all aspects of CO₂e emissions. We are unclear as to whether Welsh Government will set sectoral emission targets in the second low carbon plan, and if they did, what the level of ambition would be and how they would get there. We believe there could have

been more stakeholder engagement and co design of the second Low Carbon Delivery Plan which we believe is due to be launched in COP 26. We would therefore welcome immediate committee scrutiny on the second Low Carbon Delivery Plan and carbon budget.

Many large businesses have already signed up to the UN Race to Zero campaign which includes scope three impacts in measurement so it would be fantastic to see Government also take this approach and lead by example for some of the Welsh businesses who have yet to sign up.

National Parks/ Protected Landscapes

It's notable that there is no mention of National Parks in the Minister's letter to the committee. This is disappointing given that the WG has previously emphasised the role of NPs in mitigating and adapting to climate change in its priorities for designated landscapes (see, for example the [Valued and Resilient policy statement](#)).

In the letter which accompanied the most recent funding settlement for NPAs WG highlights the importance of the next few years as a time to take action on the climate and acknowledges that a lack of capacity is holding back NPAs' ability to undertake various work including biodiversity and climate change mitigation projects. It would be really timely for the Committee to be looking at whether NPAs have the right tools and resources and what needs to change to enable them to do more in this area.

Plastics and The Circular Economy

We welcome the inclusion of plastics and the circular economy in the Deputy Ministers priorities and although we understand the challenges currently faced with the potential implication of the UKIMA, the commitment to ban plastics and introduce a DRS for drinks containers has been long discussed and many consultations have been published, all of which showing broad levels of public support. The lack of action on these basic principles as a first step in the journey to reducing our plastic waste which is having considerable negative impacts on our terrestrial, marine and freshwater environments is frustrating.

With the passage of the Environment Bill UK (as currently proposed), the Welsh Government will receive new powers to tackle certain issues of waste. We fully expect the Welsh Government to make use of these powers and to take action on some of our most persistent issues in this area, by, for example, introducing a levy on single use cups, supporting reduction initiatives for the littering of single use sanitary items and the promotion of reusable alternatives across sectors.

The issue of extending the carrier bag charge to ‘bags for life’ (and consideration of a ban on single use carrier bags) is also overdue a decision by Welsh Ministers.

The marine environment and spatial planning

Since the Welsh National Marine Plan (WNMP) was developed, ambitions for development (particularly renewables) in Welsh seas have grown significantly. Potential impacts to marine ecosystems from marine developments include wildlife collision, disturbance, man-made noise, habitat loss, and loss of access to preferred foraging areas (displacement).

The marine environment is not currently resilient and a [recent evaluation](#) shows that the status of some species, such as seabirds, is worsening. Marine planning must therefore ensure that marine development ambitions are delivered in a way which does not further hinder the achievement of [Good Environmental Status](#).

The WNMP does not have a spatial component. As Welsh seas become more crowded, we believe the marine planning system must operate at a strategic and spatial level to:

- guide the siting of developments away from the most ecologically sensitive areas;
- assess and minimise the cumulative impacts on habitats and species; and
- provide greater certainty to developers and other sectors.

Sectoral Locational guidance as currently proposed by the Welsh Government is not enough. A statutory spatial plan must look cross-sector, at either a regional or national level, to address cumulative impacts on our marine ecosystems from all marine users is required. A marine

development plan, such as those that are commonplace on land, would be one way to achieve this. Embedding a spatial approach into marine planning could be usefully considered by the committee.

Tackling Climate Change in harmony with nature: Blue Carbon

It is encouraging that the Minister recognises the importance of our blue carbon habitats in sequestering carbon. In order to meet the ambitious target to becoming carbon net-zero by 2050, it is critical we look towards the ocean and its immense carbon storing capabilities. An NRW-commissioned report in 2020 revealed that blue carbon habitat in the Welsh National Marine Plan area presently stores at least 10 years' worth of Wales' carbon emissions. Not only do these habitats act as effective carbon stores, but equally are efficient at absorbing storm energy; thus, acting as a natural flooding solution.

We recommend the Committee explore the development, implementation and funding of a National Blue Carbon Recovery Plan designed to maintain and enhance our invaluable marine blue carbon habitats.

Restoration and protection of Welsh seas

We welcome the Minister's continued commitment to seas that are "*clean, healthy, safe, productive and biologically diverse*" (a commitment made by all four UK nations within the UK Marine Policy Statement, 2011). Given that the Minister does not elaborate on priorities here, we thought it would be useful to set out our priorities for the Committee:

We recommend that the Committee scrutinises the identification, designation and management of the Marine Conservation Zones process in Wales over the next 12 months. The process of identifying sites is already severely delayed in Wales. In addition, this committee should work with the Rural Affairs Committee to consider scrutinising the UK Joint Fisheries Statement and the Fisheries Management Plans once these are made available.

Wales Environment Link (WEL) is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales. WEL is a respected intermediary body connecting the government and the environmental NGO sector. Our vision is a thriving Welsh environment for future generations.

This paper represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.



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Agenda Item 5

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Rheoli'r amgylchedd morol / Marine environment management
ME02

Ymateb gan Sue Burton - Ardal Cadwraeth Arbennig Forol Sir Benfro /
Evidence from Sue Burton - Pembrokeshire Marine Special Area of Conservation

Evidence paper to help inform the Climate Change, Environment, and Infrastructure Committee's meeting on 9th December 2021.

Submitted by Sue Burton, Pembrokeshire Marine Special Area of Conservation (SAC) Officer. The views expressed here, whilst gained through my experience of policy delivery on the ground, are my own and not on behalf of the Relevant Authorities Group for whom I work. I have worked in marine conservation in Wales for over 20 years.

Blue Carbon potential and developments in Wales

1. I am not an expert or even hugely knowledgeable about blue carbon, but I have attempted to succinctly note some of my understanding and views.
2. It is indisputable (in so much as much research has been done globally and it is now regarded as clear) that seagrass meadows, mangrove forests, and coastal wetlands store vast amounts of carbon, and their preservation and restoration hold great potential to bank carbon in the form of carbon dioxide (CO₂) and keep it out of the atmosphere, thereby helping to mitigate climate change.
3. In the UK, attention has focused on seagrass meadows, intertidal (and subtidal) muds and saltmarsh and increasingly interest is growing in the potential for seaweed such as kelp.
4. With regard to carbon locked away / sequestered every year, it has been estimated (Armstrong et.al., 2021) that Welsh marine habitats sequester at least 26,100 tonnes of carbon (or 0.03 Mt C) every year, with saltmarshes and intertidal flats accounting for a large percentage of this. This represents around 7 % of the amount sequestered by Welsh forests every year (so by around 21,000 hectares of forest).
5. Armstrong et.al. (2021) also indicate that potentially a wide range of marine habitats contribute to carbon sequestration. Their analyses showed that subtidal muds, sands and gravel were found to sequester the greatest amount of carbon, followed by intertidal flats and saltmarshes.
6. It is important to differentiate between carbon storage and carbon sequestration. Carbon storage is what happens in the leaves of trees (or seagrass) – it is short-term. When those leaves fall, their carbon can be released back into the atmosphere. Long term storage (sequestering) is of most benefit to climate impact. Sequestration is in two forms: biomass, and soil/sediment storage. The key thing about seagrass carbon sequestration is that it

releases the carbon again vastly more slowly than rainforest does because ocean sediment decay processes are so much slower. Therefore, seagrass is described as being 35 times *more efficient* than rainforest despite the comparative lack of biomass. Its not just about the plant itself, but its sediment habitat.

7. Seagrass has been touted as being a climate 'hero'. In Wales, Seagrass Ocean Rescue planted around 1.2 million seeds in two phases during 2020 to restore a 2-hectare meadow off Dale in Pembrokeshire. This was the UK's first large-scale seagrass restoration project. Dr Richard Unsworth (Swansea University) reports that "it is now our belief that the seagrass is on a very firm footing for expanding and ultimately developing into a full meadow over the coming years. Where the seagrass is in expanding clumps, it often has a canopy height of up to 60cm which is great. Invertebrate life is beginning to settle amongst the plants, and fish appear to actively use it". Contribution to fighting climate change was one of the objectives for this effort, but alongside being a demonstrator of carbon sequestration, it was the biodiversity and ecosystem function enhancement that were key drivers for the [project](#). The carbon sequestration potential of seagrass could incentivise its restoration, but this must be considered in addition to other co-benefits and ecosystem services provided by seagrass ecosystems.
8. [Oreska et.al \(2020\)](#) measured parameters for a seagrass meadow in Virginia, U.S.A., part of the largest, most cost-effective meadow restoration to date, to provide the first seagrass offset finance test-of-concept and calculated that the meadow now offsets nearly half a metric ton of CO₂ per hectare per year. But data on carbon sequestration rates for UK seagrasses are still lacking (Seagrass Restoration Handbook – Gamble et.al. 2021). Project Seagrass (pers comm.) say that we are still some way off achieving the figures needed for UK seagrass-generated carbon credits to be traded on carbon markets.
9. ABPmer (2021) detail the Blue Carbon value of carrying out intertidal wetland (saltmarsh) restoration though the managed realignment of coastal defences.
10. Interest in kelp may help seaweed producers attract financial backing to farm kelp for food or alginates, but the potential 'greenwashing' by overselling blue carbon benefits can detract from the genuine benefits that such enterprises can bring (e.g. reducing demand on wild stocks, local jobs...). Aquaculture is a potential growth industry in Wales, and we should take care to ensure that benefits to and impacts upon the natural environment are not overlooked in the blue carbon 'rush'.
11. Everyone wants to 'do blue carbon' no one wants to measure carbon!
12. The level of interest in, and advocacy for, blue carbon is huge. There are now many organisations and research institutions exploring this issue. They are seeking to better understand how the protection and creation of habitats (nature-based solutions) can play a more significant role in contributing to Nationally Determined Contributions (NDCs) for mitigating climate change under the 2015 Paris Agreement.
13. Blue carbon potential should not be all about new restoration, but also protection of what we already have. For example, loss or deterioration of seagrass beds not only leads to the loss of their carbon sink capacity but could also potentially release the carbon already sequestered in their sediments.

14. Armstrong et.al. (2021) state that whilst there is limited evidence on how human activities may disrupt carbon sequestration, protecting marine habitats from damaging activities is likely to be important. Studies such as Luisetti et al. (2019) for example have proposed that the cessation of bottom trawling would promote improved carbon storage in subtidal sedimentary habitats.
15. Blue carbon is being used as a major incentive for Marine Protected Area (MPA) protection/restoration. This is a concern as many claims for carbon capture and figures for “offsetting” are currently unsupportable (although there are networks that are working on improving this).
16. Using blue carbon potential as a driver for MPA management is a suspect tactic as figures are currently so unsubstantiated. However, using the blue carbon ‘carrot’ in addition to the solid biodiversity and ecosystem function benefits of better protected MPAs can perhaps be useful if it attracts badly needed support and resource for MPA management. But personally, I find the constant distraction from the core need of MPAs to address the decline in biodiversity saddening. Why is supporting marine protection, conservation and restoration for the sake of nature and its associated ecosystem benefits to the planet and us (at face value) not enough? The human economic desire to measure everything’s worth before it can be regarded as valuable has delayed progress and stalled marine conservation efforts for decades. This is why we now find ourselves facing a biodiversity emergency as well as a climate one.

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Marine Protected Area (MPA) Management

17. I input to the original Marine Protected Area (MPA) inquiry by the Climate Change, Environment, and Infrastructure Committee (CCERA) in 2017 on behalf of the Relevant Authorities Group (RAG) for the Pembrokeshire Marine Special Area of Conservation (SAC). CCERA members conducted a very thorough inquiry, and I was impressed at the comprehensiveness of understanding shown for the complex issues involved.

18. The final report and recommendations in “Turning the tide? Report of the inquiry into the Welsh Government’s approach to Marine Protected Area management” (August 2017) was an excellent summary of what needed to be done to improve MPA management in Wales.
19. I also input to the follow-up in 2019 with a letter on behalf of the RAG (April 2019 - the content is still all valid) and provided oral evidence in the Senedd in June 2019. CCERA then published its report “Welsh Government’s progress on Marine Protected Area management” (November 2019).
20. As with the original report in 2017, the 2019 follow-up report showed a clear understanding of the issues and made some useful recommendations. I will comment on (some of) these individually below. It was even stronger than the 2017 report and very welcome as it helped to raise the profile of and provide momentum to MPA management discussions (as indeed is CCERA’s current short piece of work on marine environment management).
21. In January 2020, Welsh Government provided a written response to the 2019 follow-up report and its recommendations. This was not sent out to or raised with the Welsh MPA Management Steering Group (MSG) and it was April 2020 before I and some members of the MSG were made aware of it.
22. My dismay at not being aware of Welsh Government’s response was compounded further upon reading it. I will comment as relevant within the discussion on the recommendations below.
23. [Recommendation 1 \(MPA strategy\)](#) – Whilst the production of the Framework and Action plan by the MPA MSG has marked progress, there is a distinct lack of ambition and vision for what is needed and wanted with respect to management of the marine environment. The current MPAs and their management do not meet the needs of the people of Wales for a healthy and productive and well-managed environment. There is a need to increase understanding of the marine environment, what it contains, and our reliance upon it for multiple purposes. The documentation produced to date is process-driven and dry (noted that the target audience is marine managers) and because of that it is hard to follow, much less be enthused by. Perhaps the lack of a strategy is due to Welsh Government not wanting to raise expectations (or invite further pressure) due to its failure to look after what we have already? Failure to adequately manage the marine environment is a global one, so Welsh Government should not feel alone here, but their ambition in areas such as well-being of future generations and sustainability does more to highlight their shortfall towards improving biodiversity. A strategy would aid wider stakeholder engagement. It is possible to frame things whilst managing expectations.
24. [Recommendation 2 \(MPA Management Steering Group wider reach\)](#) – The Wales MPA MSG is effectively a Wales-wide Relevant Authority Group and I can understand why Welsh Government need to limit membership, not least because of size. The WMAAG provides opportunity for greater input and the MSG have since 2020-21 invited non-MSG members to submit applications for their annual action plan funding round. But, to connect to recommendation 1, greater understanding of the importance of well-managed MPAs would

aid input to the MSG and benefit MPA management as a whole. To quote David Attenborough “No one will protect what they don’t care about”.

25. [Recommendation 3 \(IFCA potential\)](#) – For the sake of brevity all I will say here is that I feel that we are disadvantaged in Wales in not having IFCAs. I acknowledge that BREXIT has completely overshadowed fisheries management abilities, but even fishermen I know bemoan the loss of the sea fisheries committees and want improvements to management. As with an MPA strategy, why can’t we look at what we need, and look for ways to work towards it rather than unquestioningly settle for what we have?
26. [Recommendation 4 \(funding an area-based approach\)](#) – As a site-based MPA Officer, I was obviously extremely disappointed to see that Welsh Government outright rejected this recommendation. I know through discussion with multiple MSG members that they would welcome readdressing this. There appears to have been some “historical revision” going on regarding this issue and the decisions recalled from 2015/16. I would like to bring some clarity. The funding breakdown suggestion presented by Welsh Government in 2015/2016 was rejected by MSG members because it was inequitable and not proportionate to management authority jurisdiction (I provided this marked “confidential – sensitive” by Welsh Government within my input in 2019). No alternative break down was suggested as NRW and Welsh Government were of the opinion at the time that they could not fund the MPA network as discussed and there was unfortunately no room for negotiation on the issue. This was an attempt to get relevant authorities to pay more and for NRW to hugely reduce their costs and just pay the same as for example a single local authority (grossly unfair given NRW’s size and jurisdiction). Welsh Government pointed out that they effectively contribute via NRW and local authority revenue streams. In my opinion it seems that following presentation of an unsuitable funding model, and with no further determined investigation into alternatives, further pursuit of funding for the MPA existing (or enhanced) network was shelved which allowed the MSG to focus on strategic work. From the MPA MSG minutes, 27th January 2016: “It was noted that a full-time post at each of the current seven areas was the preferred option; however, a part-time post would be more practical and affordable. Group members expressed concerns over the enlargement of areas. It was suggested that when locality was lost, local authorities were less likely to support the areas”. Five years later then it seems reasonable to return to discussing funding an area-based approach to MPA management. It was not the proposal for the seven-area approach that was rejected, but rather the unequitable funding model presented to support it at that time.
27. The insistence towards directing effort/resources towards (only) strategic work (that benefits NRW responsibilities under international agreements such as OSPAR for example) restricts the ability to progress much-needed local management and compromises site-level management momentum. Feasibility studies and ‘pilots’ that can be applicable across the network (which are permitted within the MSG action plan funding) cannot always cover local management action needs.
28. There has been much concern from RAGs following NRW’s adjustment of core funding to project funding. Further pursuit of NRW funding for RAG work has been halted due to NRW’s assertion that there is no appropriate funding mechanism under which to do so. It is essential

to RAG future functioning that NRW contribute financially to the partnerships. If other managing authorities see that the statutory conservation agency is not paying in, then they will be (justifiably) far less inclined to continue to do so. I'd also like to point out the vast practical difference between guaranteed core funding you can plan on, and competitive grant funding you can't predict, and which is not suitable for ongoing pro-active management work.

29. Feature condition across sites appears to have declined further since input to the MPA Inquiry in 2017. This makes funding of effective MPA management even more imperative. It is extremely difficult to link work/effort to positive changes in feature condition (I know as we were tasked to do that some years ago and justify all the work we had been doing to NRW). Whilst there have been some useful pieces of work, there is very little that has actually been delivered nationally that has made a demonstratable local positive difference to site condition.
30. Actions emerging from the national level to address strategic pressures often need to be taken on a local level, implemented by officers working locally and capitalising on local relationships and support. Partnership working is valued by NRW. Nature Partnerships across Wales have Welsh Government support – why not marine nature partnerships?
31. In Welsh Governments response in January 2020, it was stated that “The nature and the spatial scale of the MPA network in Welsh waters has changed significantly from when there were large spatially discrete sites, such as the five marine Special Areas of Conservation (SACs), to the current complex matrix of 139 offshore and inshore sites.” This is distracting and simply not as significant as made out as the vast majority of MPAs (including multiple intertidal SSSIs) sit within the boundaries of the five main marine SACs touching the coast. There does need to be greater joining-up between management of offshore sites however and cross-border sites are complex.
32. [Recommendation 5 \(integrated working with RAGs\)](#) – Although Welsh Government have accepted this recommendation, progress has yet to be made on it. No doubt this has been overshadowed by BREXIT closely followed by the Covid-19 pandemic.
33. I have run out of time and space to write further on the remaining 10 recommendations, but as above no doubt BREXIT and Covid-19 are largely a reason for delays in progress, although some work (e.g. the Assessing Welsh Fishing Activity project) really should have been progressing and reporting before then. I was hopeful that the area statement work by NRW (notably here the Marine Area Statement) would provide some impetus for action. The value they will hopefully add will be created by partners working locally.
34. Fundamentally in the marine environment a multi-sectoral approach is needed and experience to date shows that acting on these responsibilities jointly is the only logical route to successful management implementation. I am grateful but also frustrated to be in the position where I can aid this. I look forward to the opportunity to provide oral evidence to the CCERA Committee and hope to be able to expand as needed then.

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Climate Change, Environment and Infrastructure Committee
Blaenoriaethau ar gyfer y Chwedd Senedd / Priorities for the Sixth Senedd
PR 48

Ymateb gan Cronfa Bywyd Gwylt y Byd (WWF) Cymru /
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We are WWF Cymru, and we are fighting to restore and protect Welsh nature, tackling climate change and reduce Wales global impact on nature. We're determined to ensure that people and nature can thrive together, for generations to come.

Committee priorities for the 6th Senedd

- The future of food, farming and land use in Wales
- Wales' global impacts on climate and nature overseas - global responsibility
- Low carbon delivery plan and 2nd carbon budget
- Environmental governance and principles bill
- Welsh Seascapes
- The nature emergency and nature targets
- Innovative funding

The Future of Food, Farming and Land Use in Wales

In the Minister Julie James' letter to the committee outlining Welsh Government's priorities in relation to climate change, environment and infrastructure, we noted that the letter did not specifically refer to the key role that the food and farming sector needs to play. Importantly, it did not acknowledge that our food system is at risk from a changing climate. It also directly contributes towards climate change, with agriculture contributing around 16% of Wales' total

greenhouse gas emissions¹. Based on UK data, food manufacture, transport and retail emissions account for another 5.5%. Furthermore, unsustainable land use is one of the key drivers of biodiversity loss, with more than 80% of Wales' land utilised for agriculture. Crucially, our land is our biggest natural defence against climate change and it could be our biggest ally in restoring nature. We therefore believe that this committee has to consider within its priorities the crucial role of food and farming (from farm to fork – production to consumption), and land use.

The Legislative Programme confirmed that the Government plans to bring the Agriculture Bill to the Senedd in this Senedd year. This critical piece of legislation will shape our landscapes, ecosystems and rural communities for many years to come. WWF Cymru sees ecological resilience, food production and the long-term viability of farming in Wales as interdependent; a healthy environment underpins food production itself. For example, robust, healthy living soils are vital for the medium and long-term viability of Welsh agriculture and our food supply, as well as being crucial for carbon sequestration and biodiversity.

The Agriculture Bill must therefore respond to the triple challenge of delivering high quality sustainable food whilst restoring nature and getting to carbon net zero. The recent IPCC report adds significant context to this ambition and the Government will have to consider the new data and advice contained in the report closely alongside its work on the Bill. **With this in mind, WWF Cymru strongly recommends that the Climate Change, Environment and Infrastructure Committee request joint scrutiny of the Agriculture Bill and proposed Sustainable Farming Scheme, with the Economy, Trade and Rural Affairs Committee.**

The Ministers letter talks about the need to step up investment in resilient ecological networks and transformative change to reverse the loss of biodiversity. We agree, and believe that the Sustainable Farming Scheme will be crucial vehicle for this in incentivising local and strategic landscape scale nature creation/restoration interventions which respond to the nature and climate emergency.

Wales' Global Impacts on climate and nature overseas - Global Responsibility

One of the key factors driving the global climate and nature emergency is deforestation and habitat loss. The International Panel on Climate Change is clear that without our forests, we will fail to limit global warming to 1.5°C. Wales needs to play its part by changing what it buys, consumes and invests in, since these choices can drive unethical practices and environmental degradation overseas.

Ensuring supply chains are fair, ethical and sustainable is important for a number of reasons, including Wales' obligation to establish itself as a Globally Responsible Nation in the Well-being of Future Generations Act for Wales. Wales has a responsibility to consider how its practices impact global habitats, but Wales also has an opportunity to demonstrate global leadership towards driving sustainability across commodity supply chains around the world.

¹ IPCC, 2021: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J. B. R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekçi, R. Yu and B. Zhou (eds.)]. Cambridge University Press. In Press.

More than 50% of global forest loss and land conversion is attributable to the production of agricultural commodities and forestry products demanded by consumers. Precious habitats like the Amazon are being burnt to clear land - rainforests are being destroyed to produce just a handful of commodities. Wales imports significant quantities of agricultural and forest commodities, some of which are driving deforestation and habitat destruction overseas. Whether that is commodities for the production of soymeal for livestock feed in Wales, palm oil used in everyday supermarket items, beef imported into Wales, cocoa used in many Welsh treats and desserts, or even rubber used to produce latex or car tyres.

WWF Cymru, along with RSPB Cymru and Size of Wales have formed a Deforestation Free Nation Partnership. We have commissioned research to provide data, for the first time in Wales, of the quantities of agricultural commodities: cocoa, palm oil, beef, leather, natural rubber and soy, and estimates of the quantities of forest commodities: timber, pulp and paper, that are imported into Wales. The report, to be launched in October this year, provides an analysis of Wales' demand for these agricultural and forest commodities that are driving deforestation and habitat conversion in the countries in which they are produced, contributing to biodiversity loss, greenhouse gas emissions and social issues.

The research confirms that an area equivalent to 40% of the size of Wales (823,000 hectares) was required overseas to grow Welsh imports of cocoa, palm oil, beef, leather, natural rubber, soy, timber, pulp and paper in an average year between 2011-2018. Crucially, 30% of the land used to grow Welsh imports of commodities is in countries categorised high or very high risk for social and deforestation issues. This means commodity supply chains supplying Wales in these countries risk deforestation, conversion of natural ecosystems and/or social issues, such as child or forced labour. The GHG emissions associated with the conversion of natural ecosystems and changes in land cover for the production of Welsh imports of soy, cocoa, palm and natural rubber total 1.5 million tonnes CO₂ each year. This is equivalent to 4% of Wales' total estimated domestic and imported goods carbon footprint, or 22% of the GHG emissions from transport in Wales. However, this overseas impact is not accounted for in Welsh carbon budgets. There is a need for Scope 3 emissions to be accounted for i.e. emissions across the 'cradle-to-grave' supply chain of the product – from the extraction, production and transportation of raw materials, to the finished product's transportation to the customer, its use and its disposal.

The research is clear – if we are serious about tackling climate change and nature loss in Wales, we have to also address our overseas impacts. We would welcome committee scrutiny in relation to Wales and global responsibility.

Low carbon delivery plan and 2nd carbon budget

We agree with the Minister on the need for the 2020s to be 'the decade of action' if we are to meet net zero by 2050. We also agree of the importance of the second Low Carbon Delivery Plan and carbon budget in working towards this 2050 objective. Given the new commitment to a 2050 net zero target, we want to see a tightening of targets and transparent, timebound pathways towards identifying them, particularly clear detailed pathways for agriculture and land use, as well as blue carbon (carbon captured by the ocean and coastal ecosystems through e.g. seagrass). We also want to see scope 3 emissions accounted for in carbon budgets. We are unclear as to whether Welsh Government will set sectoral emission targets in the second low carbon plan, and if they did, what the level of ambition would be and how

they would get there. We believe there could have been more stakeholder engagement and co design of the second Low Carbon Delivery Plan which we believe is due to be launched in COP 26. We would therefore welcome immediate committee scrutiny on the second Low Carbon Delivery Plan and carbon budget.

Environmental governance and principles bill

There needs to be a shift in priority to bringing forward the environmental governance and principles bill as it is crucial in establishing environmental governance arrangements and principles in Wales post Brexit. We were disappointed that this legislation was not included in the Welsh Government's legislative programme for the first year of this Senedd. While we welcome the appointment of the Interim Environmental Protection Assessor, we would stress that this appointment does not bridge the governance gap which arose on the UK's departure from the EU at the start of this year. It therefore does not diminish the urgency of legislating for the robust long-term arrangements needed to do so, as has been done or is near completion in all of the other UK countries. We would like scrutiny of this work to be prioritised, and allocated sufficient government resource now, to ensure that a bill can be laid early in the second year of the Senedd. We would stress our support for the next, urgent phase of development of policy and legislation to establish an independent environmental governance oversight body; enshrine a high level objective and core environmental principles to fill gaps left by EU withdrawal; and create a framework for statutory nature recovery targets.

Welsh Seascapes

Julie stated in her letter to the committee "Our vision for our seas is that they are clean, healthy, safe, productive, and biologically diverse. Wales has important marine habitats, such as seagrass forests and saltmarshes. Our approach is structured around assessment, protection and management, and restoration. Effective marine planning for, and regulation of, new development is crucial to enabling sustainable marine sector growth, particularly for the development of marine energy projects to contribute to net zero".

There is a need for this committee to scrutinise Welsh Government plans in relation to Wales' marine environment. In the Programme for Government there is a particular commitment to develop a scheme to restore seagrass and saltmarsh. Committee scrutiny should focus on how they intend to develop the scheme and how much money they are resourcing it with. We believe the Welsh Government should be leading and co-ordinating coastal habitat restoration efforts, with incorporation of seagrass restoration & expansion, and ambition to develop seaweed opportunities for example as agricultural feed and food products.

The nature emergency and nature targets

This is a crucial period for biodiversity at a global level, with the Convention on Biological Diversity likely to take place next year in China having been postponed this year. The hope is that this conference will achieve for biodiversity what can hopefully be achieved for the climate at COP26 in Glasgow. If the Welsh Government is serious about addressing the nature crisis in Wales it will need to continue to show leadership, to support ambitious global targets to restore biodiversity and to commit to embedding targets in domestic law. This will provide crucial accountability and focus Welsh Government's attention on achieving the targets and milestones, in the same way we have seen happen on climate. Along with RSPB and WEL

we jointly published a report titled *Putting Wales on a Path to Nature Recovery* in June which we would like the committee to consider. Many of the actions that we need to take to protect threatened wildlife will also serve as nature-based solutions to flooding, soil erosion and water and air pollution and also help capture carbon to reduce net greenhouse gas emissions. We need to adopt a nature positive approach, recognising the value of nature, placing it on the path to recovery and transforming our world to one where people, economies and nature thrive.

In the absence of clear and binding targets, we have not seen joined up action at the scale that is needed. We simply can't wait for years to the Welsh Government to set, and then implement nature targets. Targets are needed now. It is vital for this Committee to take up the agenda left by its predecessor and give a clear lead on this issue, so that tackling the climate and nature emergencies should be embedded into all the Welsh Government's key decisions. We therefore urge the Committee to consider this issue as the earliest opportunity.

Innovative funding

Government funding is insufficient to deliver nature restoration at the scale and pace that nature requires. WWF Cymru urges Government to embrace innovative funding mechanisms (such as Bonds) to leverage additional capital into transition to regenerative farming and wider environmental outcomes. We support the delivery of transformational, systemic nature-based policy solutions that both sequester carbon and restore biodiversity.

I gael mwy o wybodaeth, cysylltwch â / For more information, please contact:

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Ymateb gan Dr Richard Unsworth, Athro Cyswllt mewn Bioleg Forol - Prifysgol
Abertawe, a Chyfarwyddwr - Project Seagrass /

Evidence from Dr Richard Unsworth, Associate Professor of Marine Biology, Swansea
University and Director - Project Seagrass

Evidence paper: Blue Carbon potential and developments in Wales

Evidence paper to help inform the Welsh Government Climate
Change, Environment, and Infrastructure Committee's meeting
on 9th December 2021.

Submitted by Dr Richard Unsworth, Associate Professor of Marine Biology at Swansea
University and Director of the Wales based global marine conservation charity Project
Seagrass. The views expressed here, whilst gained through my experience whilst working
for Swansea University are my own and not on behalf of Swansea University, however they
do also reflect the views of Project Seagrass.

Background

- Seagrass meadows are subtidal (underwater) and intertidal (beach) habitats comprised of plants adapted to life in the ocean. These sensitive plants and the meadows they create provide many important functions supporting coastal livelihoods. They support fisheries through provision of fish nursery areas, they enhance biodiversity, they protect our coastlines, and importantly they store and lock up carbon into marine sediments.
- Blue carbon is simply the term for carbon captured by the world's ocean and coastal ecosystems and therefore in Wales, habitats such as Seagrass Meadows, Salt Marshes and Kelp Forests are considered blue carbon habitats.
- I am a member of the UK Blue Carbon working group, have published academic articles about Blue Carbon, and I am an accepted authority on the biology and ecology of seagrass meadows and their conservation and restoration. This includes publication of over 100 academic articles on the subject from studies in the UK and globally. I led the UK's first seagrass restoration project based in Dale (Pembrokeshire) that is now showing signs of success.
- There is good evidence globally and in the UK that organic carbon can be stored in high quantities within so called Blue Carbon habitats. Healthy seagrass meadows will lock up vast amounts of carbon each year. But this storage is context specific not habitat specific. For example, value in seagrass or salt marsh vary significantly

between sites and may depend on the anthropogenic, biological, physical and environmental conditions.

- Many Blue Carbon summary reports have been written about the potential of these resources to contribute to the UK and to the Welsh commitments to achieving net zero and becoming included into future Nationally determined Contributions (NDCs). Although these reports are well constructed, the very data that underpins them is largely insufficient. We have some data on Blue Carbon storage and sequestration in Wales but data is grossly inadequate.
- The coverage of seagrass in Wales is likely a fragment of its historic extent. Scant records provide some evidence of this but two factors are important to consider:
 - Wales has decimated its coastline and arguably removed vast areas that would have once been carpeted with Blue Carbon habitats. As the world's first industrialised nation we ripped apart our coastal bays, estuaries, inlets and sheltered waters to build ports, harbours, processing plants, and create towns and cities for industry workers.
 - As part of this industrialisation we also led the world in metal mining, an industry that developed over thousands of years. The real impacts of this mining activity will never truly be known, but we do know that still to this day metals still flow and contaminate catchments throughout Wales. These heavy metals are well established to be toxic to seagrass.
- Seagrass in Wales in some locations has expanded in coverage in the last decade, however noticeable declines in seagrass condition and area have occurred and still are occurring with limited action to halt or reverse the loss. A major seagrass meadow disappeared close to Llanrhidian marshes in the Burry Inlet with limited consideration from NRW for the causation other than to indicate that "the site wasn't suitable for seagrass". An extensive seagrass meadow at Littlewick in the Milford Haven Waterway has declined over the last 30 years due to poor water quality with limited consideration of measures to remedy the problem.
- Restoration of seagrasses and other marine habitats create a huge opportunity for contributing towards carbon capture and brings with it huge potential co-benefits, such as enhanced biodiversity, fisheries support and coastal protection. High resolution modelling of potential seagrass restoration sites in Wales highlights extensive potential opportunities.
- Wales is leading the way in UK (and European) seagrass restoration for the following reasons:
 - Has led research on seagrass restoration for over a decade, including the UK's first major seagrass restoration project.
 - Has an internationally leading group of experts at Swansea University on the ecology, conservation and restoration of seagrass.
 - Is the birthplace and home to the world's only dedicated globally facing seagrass conservation charity Project Seagrass.
 - Is home to an exciting project to create one of the world's first seagrass restoration nurseries in Pendine (Carmarthenshire).
 - Is leading the way in creating international networks with interdisciplinary experts in the field.

Actions required for seagrass and Blue Carbon in Wales

Legal responsibilities and instruments

- Land ownership around our coasts within the intertidal and subtidal area creates a barrier to undertake research and restoration of marine habitats. There is currently disconnect between the Crown Estate and other statutory regulators. In some locations, complicated networks of private land owners and occupiers can raise unpredictable site-specific barriers to gaining access to and permission to work on the foreshore and seabed.
- The Crown Estate as the principal landowner within our coastal seas is tasked under its duties in the Crown Estate Act 1961 with maintaining and improving the value of crown land. Blue carbon habitats have significant economic value (fisheries, carbon, biodiversity, water filtration, coastal defence). By allowing the degradation of the seabed and its biodiversity, and not supporting their restoration (including profiting from restoration) is contrary to its remit to enhance the value of this land.
- There needs to be an alternative route to securing statutory permissions for undertaking habitat restoration/enhancement that brings together land owner support with Welsh Government agencies in a simple straight forward manner that encourages the restoration of our seabed with Blue Carbon habitats. Staff within NRW are very helpful and supportive of marine habitat restoration but the system of governance for this is inherently unhelpful. The current marine licencing process was designed for managing potentially damaging operations and is a financial and logistical barrier to scaling up efforts.
- Currently the legal protections for seagrass are insufficient and largely meaningless. Stronger enforced measures are required to protect seagrass in all areas.

Scientific needs

- Consideration of marine and coastal habitats for carbon storage should look way beyond just the basics of organic carbon storage and sequestration and consider their whole Greenhouse Gas Balance. There is considerable potential that where habitats are in a degraded and stressed state that they become net emitters of greenhouse gases through methane and nitrous oxide emissions. Those habitats in lower salinity waters are likely more susceptible to such release.
- Creation of scientific networks to enhance understanding and develop improved action in support of Blue Carbon as a nature-based solution to climate change.
- The Welsh Government needs to make better use of its Universities to answer targeted research questions and pursue avenues of work congruent to improving the state of our coastal seas through a longer term vision.

Conservation opportunities

- Blue Carbon habitats are threatened by a range of factors, some of which are small scale and are 'low hanging fruit' in the context of marine conservation. Bottom trawling in SACs (e.g. Pembrokeshire Marine SAC) remains a threat to seagrass.
- Intertidal tractor use remains a threat to seagrass in some locations where it is acceptable to drive over seagrass.
- Boat anchoring remains a problem in seagrass in some areas. Increased investment in visitor moorings using Advanced Mooring Systems would reduce this activity.

- Providing fishermen with incentives (in the same manner as how farmers are paid to improve biodiversity) to support Blue Carbon conservation and restoration would create ready teams of marine conservation allies and wardens.
- Improved communication about where seagrass is and its importance will help reduce impacts.
- Some locations containing extensive seagrass slip between the gaps of conservation management. The Inland Sea (Holyhead) is such an example where it is largely unmanaged yet highly threatened by poor water quality.
- Wales could create a strategy to bring in external Blue carbon funding/investment as a means to revitalise its coastal environment and create so called 'Green Jobs'. This requires cross government initiatives aimed at solving bottlenecks.
- Restoration and conservation of our coastal habitats requires bigger joined up thinking across multiple stakeholders to create catchment based 'ridge to reef' type projects that improve coastal habitat connectivity.

Complex problems that need fixing and require urgent action

- Many seagrass meadows in Wales are in a poor state due to water quality. The biggest threat to coastal waters is eutrophication from excess nutrients flowing into places such as Milford haven waterway. **This is slowly killing existing seagrass.**
- The growth of poorly managed intensive farming in Wales is exacerbating problems of eutrophication and its impact on the coastal environment.
- Restoration efforts will fail without investment and action to improve coastal water quality. Nutrients and pollutants from agricultural runoff and inefficient sewage systems will limit the potential for marine vegetated habitats to recover regardless of restoration efforts.

**Climate Change, Environment,
and Infrastructure Committee**

Julie James MS

Minister for Climate Change

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22 November 2021

Dear Julie,

Reviewing Prosperity for All: A Climate Conscious Wales – A climate adaptation plan for Wales

At our 11 November meeting, we received a presentation from Baroness Brown of Cambridge, Chair of the Adaptation Committee of the Climate Change Committee ('the CCC'), on the CCC's Climate Change Risk Assessment (CCRA3) Technical Report and Advice Report, published in June 2021.

The CCC's Advice Report makes for sobering reading. It throws into sharp focus the challenge that lies ahead for the Welsh Government to ensure that Wales is protected from the worst effects of climate change.

During our discussion with Baroness Brown, she explained the Adaptation Committee has not, to date, had a role in assessing the Welsh Government's climate adaptation plan *Prosperity for All: A Climate Conscious Wales* ('the adaptation plan') or progress towards implementation of that plan. However, she said the Adaptation Committee would be open to undertaking such work, should the Welsh Government request it to do so.

We believe an independent assessment by the Adaptation Committee would provide important external scrutiny that would otherwise be missing from the review process.

- Can you clarify whether, how and when, you intend to involve the Adaptation Committee in reviewing the current adaptation plan?

On a related matter, according to the Monitoring and Evaluation Framework accompanying the adaptation plan, the Welsh Government's Climate Change Portfolio Governance Board (CCPG) meets regularly to discuss progress in delivering commitments set out in the plan and in *Prosperity for All: A Low Carbon Wales* (superseded by *Net Zero Wales Caron Budget 2 (2021 to 2025)*). It goes on to state

the CCPG “in turn **reports to the Climate Change subject committee of the Senedd** (emphasis added), and the Cabinet of Welsh Government”.

- Can you clarify how and when the Committee can expect to receive its first progress report from CCPG, and how regularly reports will be provided thereafter?

Finally, we note that, in May 2021, the CCC wrote to the Welsh Government to advise it would be changing its practice in relation to its annual UK-wide Progress Report to the UK Parliament. The letter suggests the CCC could not include 2019 Welsh emissions data in the latest UK Progress Report (June 2021) because it was not published in time. The CCC explains that, for future years, the Welsh emissions data will not be included in UK Progress Reports unless it is made available with sufficient time for analysis. We understand the CCC wrote in similar terms to the other devolved administrations.

- Can you share your response to the CCC with us, and publish it on the Welsh Government’s website?
- Can you clarify what this will mean in practice and whether you are satisfied that this will have no impact on the Senedd’s ability to scrutinise the Welsh Government’s progress on emissions reduction?

I should be grateful if you would respond to the above as soon as possible, and by 6 December 2021 at the latest.

Yours sincerely,



Llyr Gruffydd MS,
Chair, Climate Change, Environment and Infrastructure Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

Sir David Henshaw
Chair, Natural Resources Wales

22 November 2021

Dear Sir David,

Unpermitted sewage discharges

The matter of unpermitted sewage discharges by water companies both sides of the border has been the subject of intense political and public debate in recent months.

We are aware that the Environment Agency and Ofwat have launched an inquiry into sewage treatment works, following the admission by water companies in England that they could be releasing unpermitted sewage discharges into rivers and watercourses.

It would be helpful if you could clarify:

- whether Natural Resources Wales and Ofwat plan to undertake a similar inquiry into sewage treatment works in Wales,
- if no such inquiry is planned, why you do not consider one to be necessary.

I should be grateful to receive a response from you as soon as possible, and by 6 December 2021 at the latest.

I am copying this letter to Jonson Cox CBE, Chair of Ofwat.

Regards,



Llyr Gruffydd MS,
Chair, Climate Change, Environment and Infrastructure Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

Agenda Item 6.3

Mick Antoniw AS/MS
Y Cwnsler Cyffredinol a Gweinidog y Cyfansoddiad
Counsel General and Minister for the Constitution



Llywodraeth Cymru
Welsh Government

Huw Irranca-Davies MS
Chair
Legislation, Justice and Constitution Committee

25 November 2021

Dear Huw,

Thank you for your letter of 15 November. I updated the Committee on the quadrilateral meeting of frameworks Ministers in my letter of 19 November.

Regarding your specific points:

At the quadrilateral meeting, on 10 November, agreement was reached on cross cutting issues affecting the wording for Common Frameworks, namely to the wording of the text for International Relations, the Northern Ireland Protocol and the process for how exclusions for policy areas in frameworks impacted by the UK Internal Market Act will be delivered. As I explained in my letter of 19 November, the agreement of the Welsh Government to UKIMA exclusions text is without prejudice to the ongoing judicial review in relation to the Internal Market Act.

Following the quadrilateral meeting, the frameworks are progressing rapidly to publication for scrutiny by committees of the legislatures. The Public Health Protection and Health Security Framework has already been published, on 28 October. Framework documents are being finalised and publication dates are still fluid, but given these caveats every effort is being made to publish frameworks for scrutiny on the following dates:

2 December

Blood Safety and Quality; Organs Tissues and Cells; Company Law (NIE and UKG only); Specific Quantities (NIE and UKG only).

9 – 16 December

Emissions Trading Scheme; Late Payment; Radioactive Substances; Public Procurement; Agricultural Support; Agriculture – Fertiliser Regulations, Agriculture – Organic Farming;

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Agriculture – Zootech; Animal Health and Welfare; Plant Health; Plant Varieties and Seeds; Air Quality; Best Available Techniques (BAT: air quality); Food Compositional Standards and Labelling; Ozone Depleting Substances and F-Gases; Chemicals and Pesticides; Resources and Waste.

January 2022

Fisheries: Management and Support.

My officials have been liaising with committee clerks for some time on approaches to handling the frameworks and I understand Senedd officials are preparing to analyse frameworks and package them for scrutiny by Committees as soon as they are published.

The length of the framework scrutiny process is of course a matter for committees. It would be hugely desirable if the frameworks could be scrutinised and signed off before the beginning of Northern Ireland's pre-election period. This date has not yet been confirmed but it is likely to be in late March if the elections take place as scheduled on 5 May. I fully appreciate this puts very considerable pressure on already hard-pressed Committees to examine a very substantial amount of frameworks material in a short space of time. My frameworks policy team would be happy to offer any assistance they can to aid the scrutiny process.

Yours sincerely,

A handwritten signature in blue ink, reading 'Mick Antoniw', with a horizontal line underneath the name.

Mick Antoniw AS/MS

Y Cwnsler Cyffredinol a Gweinidog y Cyfansoddiad
Counsel General and Minister for the Constitution

Agenda Item 6.4

Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change



Llywodraeth Cymru
Welsh Government

Mick Antoniw AS/MS
Y Cwnsler Cyffredinol a Gweinidog y Cyfansoddiad
Counsel General and Minister for the Constitution

Ein cyf/Our ref MA-JJ-4062-21

Huw Irranca-Davies MS
Chair, Legislation, Justice and Constitution (LJC) Committee

02 December 2021

Dear Committee Chair

Thank you for your letter of 8 November outlining the Committee's questions from the Legislative Consent Motion debate relating to provisions in the UK Environment Bill. We are writing to provide more detail on the matters highlighted.

Firstly, we would like to clarify the comments regarding the single use plastics (SUP) Bill, in the context of the United Kingdom Internal Market Act 2020 (UKIMA). You will be aware, UKIMA was introduced following our consultation proposing bans for a number of commonly littered SUP items. While the Mutual Recognition Principle in Part 1 of UKIMA has introduced complexity in this area, our shared view is that UKIMA cannot curtail the Senedd's legislative competence in the way it purports to. This is consistent with information put forward as part of our ongoing legal challenge on this issue. The evidence provided to the Committee by the Counsel General in September and his letter in October highlight this point. Overall, we do not believe UKIMA operates so as to prevent the Senedd from legislating on devolved matters in a way that is inconsistent with the mutual recognition principle in UKIMA. Therefore, in the context of SUP we do not believe UKIMA operates so as to prevent the Senedd from legislating to ban the sale in Wales of SUP items in a way that is inconsistent with the mutual recognition principle in UKIMA.

For these reasons, we do not expect any impact on the Legislative Programme arising from UKIMA.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

As highlighted in the Reducing Single Use Plastic consultation, the Welsh Government intends delivering our ambition on commonly littered single use plastics in phases. We are taking all possible steps to introduce legislation for the proposed phase one bans, as quickly as possible, within this Senedd term. Meanwhile, officials have already begun work preparing for future phases of the work, including reviewing evidence for the 60+ additional items identified in the consultation as candidates for potential future action. In the Programme for Government, we set ourselves a high bar and a Bill is one of the options we are exploring to deliver in full a wider ambition to tackle this kind of environmental pollution.

We thank the Committee for their patience in these matters and ask them to note the UK Bill has now received Royal Assent.

Yours sincerely



Julie James MS

Y Gweinidog Newid Hinsawdd
Minister for Climate Change



Mick Antoniw MS

Y Cwnsler Cyffredinol a Gweinidog y
Cyfansoddiad
Counsel General and Minister for the
Constitution

Agenda Item 6.5

Climate Change, Environment, and Infrastructure Committee: correspondence received via e-mail from Non Davies, on behalf of Moelfre Residents, regarding the Welsh Government's Future Wales renewable energy policies – November 2021

e-mail received 23.11.21

Bore da Llyr

We write to you as our regional Senedd Member and specifically in your role as Chair of the Climate Change, Environment & Infrastructure Committee. Despite extensive correspondence in this regard and our meeting of 21 October 2021 we remain extremely concerned about fundamental aspects (as previously detailed and in summary below) of the Future Wales Plan 2040:

- Policy 17 ac 18: - the fact that the HM Treasury Department's Government Guidance on Appraisals and Evaluations (The Green Book), a statutory mandatory requirement which evaluates and quantifies the value of 'natural capital' such as landscape and therefore the value of the loss of landscape, was not applied.
- The absence of evidence presented to date which supports the claim that sufficient compensatory mechanisms were applied thereby negating the need to apply the Green Book.
- The delay in developing promised Guidance to accompany FW Policy 2040, a reasonable expectation when making life changing decisions
- That decision making on these Developments of National Significance can ultimately be determined by one individual's subjective interpretation of the terms 'acceptable' ac 'unacceptable' ('no adverse impact unless there are no less damaging alternative solutions').
- In our opinion all these elements culminate in our claim that The Future Wales Plan 2040 is ultimately flawed and as a result our human rights have been breached; Under Article 6 'right to a fair trial' by limiting our rights and the basis upon which we can object to developments on the basis matters such as of loss of 'natural capital' and the resulting adverse impacts of this including the material loss of value of homes and businesses and personal loss of wellbeing; and under article 8 'right to respect for family and private life' due to the flawed and disproportionate impact of this WG policy.

Further and in light of recent media coverage (Western Mail 20 November 2021) referencing Bute Energy, in order to maintain public confidence, we formally request that the formulation & scrutiny of FW Plan 2040 - along with its emerging adverse consequences across Wales – be reviewed and that this matter be raised at the next

meeting of the Climate Change, Environment & Infrastructure Committee which next meets on 25 November 2021 and thereby tabled for future consideration.

We look forward to a reply,

yours sincerely

Non Davies ar ran Preswylwyr Moelfre

e-mail received 29.11.21

Bore da

oes modd cynnwys y llythyr uchod gyda'r dogfennau eraill a ddanfonwyd ac a dderbyniwyd ar gyfer trafodaeth ar 9 Rhagfyr 2021/ *Please include this letter with the other documents in relation to the same subject submitted to and accepted by the Climate Change Committee for discussion on 9 December 2021:*

- Letter Clive Goodridge
- Letter Residents Safle Moelfre
- Letter Dr Jonathan Dean
- Joint Letter Western Mail (26.11.21) & Daily Post (29.11.21) - in addition as below

Diolch am eich cydweithrediad / thanking you for your co-operation in this matter

Yours sincerely / Yn gywir

Non Davies

Letter Published Western Mail 26 November 2021 & Daily Post 29 November 2021

Future Wales renewable energy policies

When the Welsh Government introduced policies on renewable energy to the final draft of the National Development Framework, now enacted as Future Wales, they did so without subjecting those policies to analysis using the mandatory H M Treasury guidance known as the Green Book. Although an Integrated Sustainability Assessment was performed for the whole of Future Wales, no policy level analysis was performed, and some key features of the Green Book approach missed out.

The Green Book requires effects on the value of "natural capital" to be included - this is the value society gives to less tangible assets such as landscapes, habitats and environments. While never as precise as estimating infrastructure costs or revenue streams, it crucially translates impacts on landscape etc into quantitative terms to

weigh up against more tangible costs and benefits. Environmental assessments are usually qualitative, but often money wins, and descriptions, and landscapes, loose.

Also missing from Future Wales are the renewable energy guidelines on acceptability, promised during the public consultation - essentially the "rules of the game" for both developers and impacted stakeholders. We understand from the minister there is no deadline for these to be produced, although proposals under these policies will be submitted soon.

We strongly believe that the guidelines, including the need to assess the impact on "natural capital" value, should be available before the first application under these policies is submitted in the first half of next year. With the right "rules" then maybe the right decisions will be made, for the right reasons, about such Developments of National Significance like Y Bryn Onshore Windfarm and numerous other wind and solar developments. We believe that the renewable energy policies, and any emerging unintended consequences on communities across Wales, should be reviewed.

Yours sincerely

Non Davies (Safle Moelfre Conwy)

Joseph Jones

Dr Jonathan F Dean

e-mail received 30.11.21

Pnawn da

Oes modd rhoi sicrwydd na fydd pryniant gorfodol yn digwydd os gwelwch yn dda - **fy mhwyslais isod**? Rheswm arall pam fod angen sustemau tryloyw a chanllawiau cydnabyddiedig wrth benderfynu

33. P.111

34.

35. 4.6.35 The Welsh Government recognises the contribution that smaller and community scale developments will have to our future energy system, however it is not envisaged that they will produce enough renewable energy to meet our needs. We therefore need to plan proactively for larger scale developments which will make a larger contribution to our targets.

36. 4.6.36 The Arup report was commissioned by the Welsh Government in 2018 and used a commonly-used methodology for mapping constraints to identify the most suitable areas for large scale wind and solar. These constraints were

discussed and agreed with stakeholders through four workshops, which occurred in the autumn of 2018, before modelling of the areas commenced. Representations have queried the additional use of residential properties as an additional constraint along with road, railway and river corridors. Arup have undertaken additional modelling which demonstrates that this would rule out much of Wales and is therefore it is unfeasible to do this. **This is particularly so where residential properties could be purchased or form part of an ownership agreement to make a scheme acceptable to nearby residential properties, therefore requiring a smaller or no buffer to be used.**

edrych ymlaen at eich ateb ysgrifenedig yn dilyn y cyfarfod
yn gywir
Non Davies

Climate Change, Environment and Infrastructure Committee: correspondence received via e-mail from Clive Goodridge and Kate Watson regarding the Welsh Government's Future Wales renewable energy policies - 22 November 2021

Hi Llyr

Some bullet points I'd very much appreciate if you could include in your discussion at this Thursday's CCEIC meeting please?

1/ Policies 17 & 18 don't safeguard individuals as Human Rights, RVAAs (significant visual impact/unnattractive place to live), impact on wildlife etc can be overruled by 'in the greater public interest,' except possibly the MOD.

2/ The advisory guidance notes to accompany policies 17 & 18 still not published so how can proposed developments be decided correctly.

3/ Land value increase vs property values decrease, can the Green Book be used for individual proposals.

4/ London School of Economics previously reported property values falling -12% when calculating for up to 150m turbines onshore, they're now proposing up to 250m turbines & still using 700 metres minimum distance from residential properties, so maybe in excess of -20%.

5/ Homes/lives are threatened, it's not all about money but mandatory buy outs should be offered or compensation for those that can't or don't want to move

6/ RWE in Scotland are proposing to offer payments tied to the property within 40db range for life of operation, even if the owners/occupants have objected to the proposal.

7/ Due to proposed offshore is there still the need for onshore to meet 2030 targets or are they over building to account for possible hydrogen production, if so shouldn't these onshore proposals be near where the hydrogen plants will be.

8/ Public inquiries should be held, especially for areas experiencing their 1st development of this kind.

9/ Re the adverse effect on our 'Wellbeing' due to the stress, anxiety, possible health concerns we now all endure for years, as soon as a proposal is known to us, before even pre application stage & then ongoing. Did WG, & ARUP, factor this into their assessment for those of us living close to the proposed sites?

Regards

Clive Goodridge & Kate Watson

Climate Change, Environment and Infrastructure Committee: correspondence received via e-mail from Dr Dean regarding the Welsh Government's Future Wales renewable energy policies - 22 November 2021

A topic perhaps on the Future Wales renewable energy policies (Policy 17 & 18) for the committee.

Treasury Green Book - humour me for a moment ...

I raised this during the NDF consultation, and have since quizzed the minister, but I've not had a particularly satisfactory conclusion. I first looked into the Green Book when fighting more pylons on Ynys Môn some years ago. My understanding is the methods in the Green Book should be applied for the evaluation of public policy. The Treasury have confirmed to me this applies to the Welsh Government, and this has been confirmed by the Senedd. It has not been used at any point in evaluation of the totality of Future Wales, or for individual policies. An Integrated Sustainability Assessment has been performed, but this misses out some aspects included in the Green Book, and has not been applied to individual policies. I have no idea where this leaves the legitimacy of policies 17 & 18 should these be challenged.

The Green Book method is a fairly straightforward cost-benefit analysis allowing the Net Present Value of policies, projects or programmes to be determined (and hence decide between options). It does though require the value of "natural capital" to be included - this is the value society give to less tangible assets such as landscapes, habitats and environments. Obviously such evaluation is never as precise as say estimating build costs or revenue streams, but crucially it translates impacts on landscape etc into cash terms to weigh up against more tangible costs and benefits. Typically environmental assessments are always qualitative, while costs and benefits are quantitative, and in my experience money wins, and "moderately adverse" descriptions loose. This is why including the financial value of natural capital in the cost-benefit analysis levels the playing field for the less tangible assets. But, as I say, none of this has been done.

Guidelines for Policy 17 & 18

During the consultation for the NDF, in the final draft, guidelines were promised to help determine when developments were, or were not, acceptable. These have not yet been produced, although applications for developments under these policies have commenced. I have asked the minister when these promised guidelines would become available, and was told that while the publication of the guidelines remains the aim of the government, there is currently no deadline for publication. This leaves

both developers and impacted stakeholders with no "rules of the game". I believe these guidelines should be drafted sooner rather than later, and the public should be consulted before finalisation. Ideally a draft should be available before the first planning application under these policies is examined.

In producing these guidelines, the valuation of natural capital (as per the Green Book), and changes to it, could be included as part of the decision making criteria in determining if a development should proceed or not. This wouldn't replace the qualitative evaluation necessary in an Environmental Impact Assessment, but would give a very tangible "cash" quantitative assessment of the impacts on less tangible, natural assets. This would help make any decisions on developments far more transparent and help gain buy-in from impacted stakeholders.

Please consider these thoughts for discussion in the committee, or if this is not a suitable topic for discussion, perhaps you could advise me who would be most appropriate to take the idea to.

Cofion
Jonathan

Dr Jonathan F Dean

Agenda Item 6.6

Correspondence received via e-mail to the Climate Change, Environment and Infrastructure Committee, from an individual regarding the proposed location of the Velindre Cancer Centre – 28 November 2021

I am a supporter of the campaign to co-locate the new Velindre Cancer Centre at the Heath UHW site and not to destroy a large area of valuable green urban space at the Northern Meadows. I believe that both of those issues are within the terms of reference for your committee.

Climate change is such a topical issue now and we have our very own opportunity to act locally. The proposal to build a replacement Velindre Cancer Care Centre on a largely green field site in north Cardiff is not only wrong clinically, but it will seriously affect the environment and climate care aspirations of Wales.

I would be grateful if your committee could spend some time debating whether this project is in the best interests of Wales, and the world, at your meeting next week. Could it please be considered then or proposed as an agenda item for a future meeting?

Over a year ago, 24 out of the 33 Oncology Consultants at Velindre signed up to a letter expressing serious concerns about the proposed clinical model and suggested that the Cancer Care facility should be on the same site as the Acute District General Hospital at the Heath, so that other specialist support services would be immediately to hand. Since then many more senior clinicians have added their support

Lady Brown spoke to your committee recently about adaptations and mitigations to meet the challenges of Climate Change. She highlighted the value of Green Urban Spaces and that point seemed to resonate with members.

At 75 years of age, I am not a NIMBY. I live in the Whitchurch area, but my concern is about the legacy which I will leave for future generations. I am currently researching the possibility of installing Solar PV panels and an air sourced heat pump. I am unlikely to achieve a payback whilst still enjoying my time on this planet. The total cost to the public purse of this project is very considerable and will be borne by future generations - but is this good use of that money?

Thank you in anticipation,