

Agenda – Climate Change, Environment and Rural Affairs Committee

Meeting Venue:

Committee Room 3 – Senedd

Meeting date: 26 October 2017

Meeting time: 09.00

For further information contact:

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Private pre-meeting (09.00 – 09.15)

1 Introductions, apologies, substitutions and declarations of interest

2 Inquiry into rethinking food in Wales – oral evidence session on food procurement – Academics

(09.15 – 10.15)

(Pages 1 – 21)

Prof Roberta Sonnino – Professor of Environmental Policy and Planning,
Director of Impact, School of Geography and Planning, Cardiff University

Dr Helen Coulson – Research Associate, School of Geography and Planning,
Cardiff University

Attached Documents:

Research Brief

Paper – Prof Roberta Sonnino

3 Inquiry into rethinking food in Wales – oral evidence session on food procurement – Hybu Cig Cymru and Food and Drink Wales Industry Board

(10.15 – 11.15)

(Pages 22 – 24)

Gwyn Howells – Chief Executive Officer, Hybu Cig Cymru



Andy Richardson – Chair, Food and Drink Wales Industry Board

Attached Documents:

Paper – Hybu Cig Cymru

4 Inquiry into rethinking food in Wales – oral evidence session on food procurement – Food and Drink Federation – postponed

(Pages 25 – 30)

Tim Rycroft – Corporate Affairs Director, Food and Drink Federation

Attached Documents:

Paper – Food and Drink Federation

5 Paper(s) to note

(11.15 – 11.20)

5.1 Letter from the Cabinet Secretary for Environment and Rural Affairs regarding recommendation 21, which relates to public procurement of food, of the Committee's report, 'The future of land management in Wales'

(Pages 31 – 32)

Attached Documents:

Letter from Cabinet Secretary for Environment and Rural Affairs

5.2 Letter from the Confor Wales Committee to the Cabinet Secretary for Environment and Rural Affairs regarding the Committee's report, 'Branching out: a new ambition for woodland policies'

(Page 33)

Attached Documents:

Letter from Confor Wales Committee

5.3 Letter from Confor National Manager for Wales, representing timber processing companies, to the Cabinet Secretary for Environment and Rural Affairs regarding the Committee's report, 'Branching out: a new ambition for woodland policies'

(Pages 34 – 35)

Attached Documents:

Letter from Confor National Manager for Wales

5.4 Letter from Director Wales, Coed Cadw, regarding the Committee's report, 'Branching out: a new ambition for woodland policies'

(Pages 36 – 38)

Attached Documents:

Letter from Coed Cadw

5.5 Letter from the Chair to the Cabinet Secretary for Environment and Rural Affairs regarding the Welsh Government's response to the Committee's report, 'Branching out: a new ambition for woodland policies'

(Pages 39 – 62)

Attached Documents:

Letter from the Chair

5.6 Letter from the Cabinet Secretary for Environment and Rural Affairs regarding the paper from the UK Assessment Panel of the IUCN World Commission on Protected Areas on the 'Future Landscapes: Delivering for Wales' report

(Pages 63 – 64)

Attached Documents:

Letter from the Cabinet Secretary for Environment and Rural Affairs

5.7 Letter from the Chair to the Cabinet Secretary for Environment and Rural Affairs regarding the Welsh Government's response to the Committee's

report, 'Turning the Tide? Report of the inquiry into the Welsh Government approach to Marine Protected Area management'

(Pages 65 – 73)

Attached Documents:

Letter from the Chair

6 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the meeting for the following business:

7 Inquiry into rethinking food in Wales – private discussion following oral evidence sessions and discussion of next steps
(11.20 – 11.30)

8 Update on issues relating to the UK's withdrawal from the European Union

(11.30 – 11.55)

(Pages 74 – 94)

Attached Documents:

Research Brief – Brexit

9 Update on the work of the Expert Reference Group on Climate Change

(11.55 – 12.00)

(Pages 95 – 97)

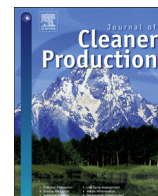
Attached Documents:

Private Paper

10 Informal private briefing from EDF Energy on dredging and depositing of sediment relating to Hinkley Point C

(12.00 – 12.45)

Document is Restricted



Balancing competing policy demands: the case of sustainable public sector food procurement



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ABSTRACT

A focus on market-based green growth strategies to pursue sustainability goals neglects the pursuit of understanding how human health is interwoven with the health of eco-systems to deliver sustainability goals. The article argues that clarifying the difference between green and sustainable public sector food procurement, with political continuity that supports and enables policymakers and practitioners to take an incremental approach to change, makes an important contribution to delivering more sustainable food systems and better public health nutrition. Five European case studies demonstrate the reality of devising and implementing innovative approaches to sustainable public sector food procurement and the effects of cultural and political framings. How legislation is enacted at the national level and interpreted at the local level is a key driver for sustainable procurement. Transition is dependent on political will and leadership and an infrastructure that can balance the economic, environmental and social drivers to effect change. The development of systems and indicators to measure change, reforms to EU directives on procurement, and the relationship between green growth strategies and sustainable diets are also discussed. The findings show the need to explore how consistent definitions for green public procurement and sustainable public procurement can be refined and standardized in order to support governments at all levels in reviewing and analyzing their current food procurement strategies and practices to improve sustainability.

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1. Introduction

Recognizing that food purchasing and catering services, including those in hospitals, care homes, schools, prisons and state companies etc., represent a significant part of public sector procurement budgets, the central premise of this article is that there is

a need for clarity about what is meant by 'green' public sector food procurement and 'sustainable' public sector food procurement. The dominant economic paradigm has led to a growing focus on market-based green growth strategies to pursue sustainability goals and, it is argued, an ecological shift is required in order to further understanding of how human health is interwoven with the health of eco-systems, and to enable policymakers and practitioners to move towards creating more sustainable food systems and better public health nutrition.

Public sector procurement, representing all of the goods and services purchased with public money, represents 13–20 percent of gross domestic product (GDP) in OECD countries, including 17

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Table 1
Examples of how green and sustainable public procurement are defined and distinguished in the literature.

Evans et al. (2010)	<ul style="list-style-type: none"> • GPP focuses only on environmental areas of concern; • SPP potentially encompasses a range of areas, but largely focuses on social and environmental aspects.
EC website	<ul style="list-style-type: none"> • GPP means that public authorities seek to procure goods, services and works with a reduced environmental impact throughout their life-cycle compared to goods, services and works with the same primary function that would otherwise be procured; • SPP means that public authorities seek to achieve the appropriate balance between the three pillars of sustainable development – economic, social and environmental – when procuring goods, services or works at all stages of the project. <p>Practical differences</p> <ul style="list-style-type: none"> • Many public authorities in the EU are implementing GPP as part of a broader approach to sustainability in their purchasing which also addresses the economic and social aspects.

percent of the EU's GDP (Evans et al., 2010), while in developing countries estimates are much higher and range from 30 to 70 percent of GDP (Perera, 2012). Procurement has been promoted as one means of reaching environmental goals since the 2002 World Summit on Sustainable Development and the Marrakech Task Force (2006–11) developed an approach for implementing sustainable public procurement (SPP) in both developed and developing countries. Since Rio +20 (2012), there has been a renewed focus on SPP as part of green growth strategies. These debates suggest that by purchasing environmentally and socially preferable goods, governments can make significant impacts on green economy transformation as part of sustainable development goals (OECD, 2014; GGBP, 2013). However, some argue that transformation to a green economy – defined as one that results in 'improved human well-being and social equity, while significantly reducing environmental risks and ecological scarcities' (UNEP, 2012) – could pose major challenges for governance mechanisms if it is to move the economy in a direction that benefits society as a whole and particularly the poor and vulnerable (Benson, 2014). Others (Garnett, 2014) point out that definitions of sustainability vary, stakeholders can have different priorities within the three 'pillars' of sustainable development and distinctions between 'green' and 'sustainable' can be amorphous.

The article draws on case study research conducted as part of the *Foodlinks*¹ project that aimed to 'revalue' public sector food procurement. It analyses five European case studies where innovative public procurement policies and practices have been successfully implemented and provides an overview of what change is happening across Europe. More explicitly, it analyses how complex relationships and synergies between economic, environmental and social concerns, as determinants of SPP, were balanced, and how the dynamic between policy and practice supported change. The five case studies can be seen as microcosms of change for wider systems of implementation, and the article more broadly examines the relationship between green growth strategies and the emerging discourse on sustainable diets that takes the debate beyond 'green' initiatives to the social and equity impacts of healthy food systems and better public health nutrition.

The article begins by reviewing current definitions of 'green' and 'sustainable' public procurement and discusses how environmental, economic and social impacts are interpreted, 'measured' and integrated within current public sector food procurement practice. It then briefly charts the multi-level policy response. The methods section is followed by the case study findings and the discussion looks beyond 'green' to include recent change in procurement regulations. Wider systems of implementation are considered and the relationship between green growth strategies and the emerging discourse on sustainable diets is explored. Key areas for future research are identified, and concluding remarks are made about future trajectories of green growth strategies and

sustainable diets, and on the significance of the findings for more sustainable public sector food procurement at all levels of government.

1.1. Green and sustainable public procurement

Although there are numerous definitions for green and sustainable procurement, the examples used in Table 1 that provides examples of how green and sustainable public procurement are defined and distinguished, typifies a lack of clarity between the two concepts. Green public procurement (GPP) definitions focus on environmental impacts whilst those used for SPP are at best 'fuzzy' and at worst, confusing. The EU website example illustrates this by including explanatory text on 'Practical differences' between GPP and SPP. This suggests that most EU public authorities prioritize GPP but see this as situated within the broader context of SPP.²

Moreover, as Ahi and Searcy (2013) note, the terms 'green' and 'sustainable' are often used interchangeably. This could present an illusion of progress towards more sustainable procurement practices or even an implicit assumption that green procurement will inevitably result in a shift towards more sustainable procurement. It is argued that failing to address these inconsistencies could lead to future confusion in the development of theory and practice (Bratt et al., 2013; Preuss, 2007). In addition, Akenji (2013) suggests that GPP by governments and public institutions is more akin to green consumerism (GC) – namely, the production, promotion and preferential consumption of goods and services on the basis of their pro-environment claims (such as eco-labelling schemes, eco-efficient production standards etc.) rather than the promotion of sustainable consumption (SC) where change in consumption behaviour needs to be accompanied by change in infrastructures (social and physical).

1.2. Environmental priorities

One explanation for why there has been less integration and implementation of social and economic impacts in public procurement tenders and contracts is that the development of methods and techniques to measure environmental impacts is more advanced and they are quantifiable. In a recent review of GPP/SPP in nine EU member states plus Norway, Evans et al. (2010) found that all case study countries cite the use of environmental life cycle assessment (LCA) (where available) as part of their public procurement strategies but social criteria were not that well established. In his review article on green consumerism, Akenji (2013: 13) also suggests that the economic growth dogma that dominates government and market promoted GC is 'carefully calibrated to not slow down the economy but to operate as a peripheral activity that safeguards only against the most damaging and immediate environmental problems.'

¹ <http://www.foodlinkscommunity.net/1132.html> (accessed 18 August 2014).

² http://ec.europa.eu/environment/gpp/versus_en.htm accessed 8 September 2014.

1.3. Economic power and shifting priorities

Others take this further and posit that European public sector food procurement contracts tend to be awarded on the basis of ‘best value’ and ‘the economically most advantageous tender’ (i.e. low cost), with little or no consideration for the effects on human health and the environment of the entire agrifood cycle (Morgan and Sonnino, 2008). Some recent research (OECD, 2012) suggests that not only is there a lack of professionalization in procurement (with it being regarded as an administrative rather than strategic objective), but also that risks and opportunity costs are rarely assessed when using it as a policy lever to support socio-economic and environmental objectives. However, counteracting this, a growing body of literature on cities as environmental leaders is emerging (Puppim de Oliveira et al., 2013), alongside research that identifies local governments as key players for ‘greening’ public procurement (Nogueiro and Ramos, 2014). Although Perera (2012) notes that proliferation of standards, claims and labels in the green product marketplace has exacerbated confusion amongst procurement officers.

1.4. Integrating social and health priorities

Another body of work examines how the role of small businesses (SMEs) as suppliers to public authorities has not only environmental benefits through provision of green products or technology, in particular for the procurement of organic food, but also for local economic development, especially in low-income areas (Walker and Preuss, 2008). Others explore the benefits to local economies of green purchasing that focuses on social and economic benefits associated with more sustainable and better quality food procurement and its benefits for public health (Morgan, 2015; Sonnino, 2009). This knowledge that governance systems can empower local actors, including small-scale producers and suppliers, has reinforced recognition that dietary change at the population level requires more than ‘green’ options, including the need to manage supply chains sustainably (Lang and Barling, 2013). There is an emerging food policy discourse on the relationship between nutrition and sustainability. Recent debates (Lang, 2014; Macdiarmid, 2013) have focussed on the concept of a ‘sustainable diet’ that ‘promotes environmental and economic stability through low-impact and affordable, accessible foods, while supporting public health through adequate nutrition’ (Johnston et al., 2014: 420). To date, most of this work is driven by the environmental agenda, and the challenge is how to make food production more environmentally sustainable and resilient while paying greater attention to nutritional quality (Garnett, 2014). Key components of a sustainable diet include eating less meat and only sustainable or certified fish. It also includes storing vegetables (where possible) and eating perishable produce in season. Eating less sugar and minimizing food waste are other key components (Garnett, 2014).

These multiple dimensions for creating more sustainable public sector food procurement raise enormous challenges for policy-makers and practitioners and, following Puppim de Oliveira et al. (2013) who suggest that sustainability begins with political ambition, the next section charts the policy response.

1.5. The policy response

At the global level, the recent emphasis on green growth strategies has resulted in newly negotiated text for the international WTO Global Procurement Agreement (GPA, April 2012³) that

includes environmental characteristics as indicative evaluation criteria for government procurement. However, as De Schutter (2014) points out, there is no binding international definition on what constitutes an SPP scheme. There has also been a parallel policymaking response at the EU level where GPP has re-emerged as a key objective of the new *Europe 2020* strategy to help support the shift towards a resource efficient and low-carbon economy. In February 2014, new directives for the reform of public procurement were adopted to support these policy objectives and harmonize GPP within Europe.⁴ These aim to address a perceived lack of clarity about how to take social and environmental criteria into account in the old directives (2004/17 and 18) and ensure greater inclusion of common societal goals in the procurement process, including environmental protection, social responsibility and public health. The new provisions include simplified rules and procedures, the right to value social considerations when evaluating tenders, the use of labelling, and life cycle costing.

The EU reforms could improve access to markets for small food producers and SMEs through more opportunities for public sector food procurement contracts. Firstly, simplified rules and procedures should enable public authorities to use more contract ‘lotting’ – where large contracts for food commodities are divided into more manageable lots that make tendering a possibility for SMEs. Secondly, by widening the range of criteria (including environmental, social and labour requirements) through life cycle costing that defines the object of procurement, the reforms could expand how public authorities make decisions for awarding contracts when assessing which tender is the most ‘economically advantageous’ (see also Morgan and Sonnino, 2008 and the case of East Ayrshire (below)). Finally, commitments made at the national level, as a primary determinant of the extent to which SPP is implemented (Brammer and Walker, 2011), could increase more sustainable food procurement at the local level. For example in Scotland, SPP is at the heart of the Procurement Reform Act (2014) and enshrines the duty of sustainable procurement within its legislative framework, and new Guidelines for NHS catering (currently out for consultation) could make Scottish hospitals legally obliged to serve more nutritious meals to patients.

As has already been noted, there has been more practical implementation of SPP at regional and city levels. This has been driven by local politicians and by recent policy developments associated with initiatives that aim to promote healthy and sustainable food to the public through more sustainable public procurement initiatives. These include local governments promoting strategies to ‘green’ their local economies and adopting environmental purchasing plans, practices and tools (Nogueiro and Ramos, 2014; Testa et al., 2014) and that also make links to regional development and entrepreneurship (Preuss, 2011).

2. Methods

Set within this contextual background, the *Foodlinks* research programme (2011–2013) experimented with knowledge brokerage activities (KBAs) to promote more sustainable food systems using the concept of communities of practice (CoPs). European scientists, policy officials, practitioners and civil society organizations participated with others interested in urban food strategies, short food supply chains and/or public sector food procurement in three CoPs. The research covered in this article focuses on the activities of the public sector food procurement CoP – with an ‘internal’ membership of 12 project partners from six European countries and nine

³ <https://www.ustr.gov/sites/default/files/GPA%20113%20Decision%20on%20the%20Outcomes%20of%20the%20negotiations%20under%20Article%20XXIV%207.pdf> Accessed 24 November 2014.

⁴ Directive 2014/24/EU replacing directive 2004/18/EC; Directive 2014/25/EU replacing directive 2004/17/EC and new Directive 2014/23/EU.

organizations (scientists (8) and policy officials (4)) and 'external' others from outside the project, including civil society organizations.

2.1. The notion of the community of practice in foodlinks

Lave and Wenger's (1991: 98) seminal work on CoPs acknowledges that although those involved have different view-points, coherence comes from "participation in an activity system about which participants share understandings concerning what they are doing and what that means for their lives and for their communities." Although the CoP was established and built up in a pragmatic, slightly artificial way (being a process of project activity, rather than emerging naturally around a topic between those with a shared interest in its purpose), the CoP acted as an arena for exchange and investigation of public procurement dynamics, logistics and standards around sustainable food and learning. Knowledge brokerage activities brought scientists (academic researchers) and policy officials together with others to build learning communities using a range of embodied and virtual knowledge brokerage tools. These created both face-to-face interaction and online virtual arenas that enabled members to experiment with and develop new ways of sharing and brokering knowledge that were relevant for their work 'on the ground' (for full details of the CoP process and activities, not included within the focus of this article, see Smith and Barling, 2013).

Wenger et al. (2002) highlight three defining features of a CoP: (i) the domain (theme) – the reason for people to come together; (ii) the practice – the framework, ideas, tools, styles that people share; and (iii) the community – the importance of continued interaction, to build relationships and trust for effective collaboration and thus, for the performance of the CoP. As the Public Procurement CoP became established, it became clear that cultural approaches and political solutions to sustainable food and its public procurement differed throughout Europe and this raised questions about its performance. There was agreement that the CoP required a unifying aim (a framework for collaboration) to exchange knowledge and practical experience and, importantly, to build relationships, trust and continuity of interaction between the different stakeholder groups that came from municipal administrations, urban, regional and national governments, European platforms, civil society and the wider academic community. This recognition resulted in the decision to use KBAs to collaborate on a report, *Revaluing Public Sector Food Procurement in Europe: an action plan for sustainability*⁵ (Barling et al., 2013). This report was built around case studies of innovative public sector food procurement practice that were drawn from CoP members' own experience and that also included a two-step Action Plan to encourage urban governments and municipal administrations to take up the challenge of more sustainable purchasing practices.

2.2. Data collection and analysis

Data collection for the report began with CoP members' proposals for case studies via a 'wiki'⁶ on a web-based platform (seven were suggested); five case studies offered possibilities for in-depth analysis and were selected. The report was written as a joint collaboration over 15 months using the 'wiki' as an on-line tool; this involved CoP members who had proposed the case studies posting information under a set of prescribed headings: i.) what

change was happening; ii.) the driving forces that made change possible; iii.) what aspects of sustainability had been prioritized and why; and iv.) the main challenges encountered. Other CoP members responded to the postings, posed questions and made suggestions for the case study 'initiators' to respond to on the 'wiki'; this built the case study data in a dynamic way and provided a successful means of virtual engagement and interaction between members around a shared knowledge-based activity. In the final stages of publication, editorial oversight was provided by the project co-ordinators.

The process of semi-structured data collection on the 'wiki', where data were sifted and refined through the challenges, questions and insights offered by CoP members, offered a collaborative way of balancing complexity and coherence. Extraneous details could be omitted, and the method also provided a degree of oversight that helped ensure key points were not overlooked. The process provided a rich data source for analysis, including references to secondary sources (academic articles, reports, websites etc.), and included the forces that were driving SPP (political, environmental and social) and, importantly, insights into *how* SPP was being implemented 'on the ground'.

2.3. Case studies

Reflecting the growing role of cities in the development of more sustainable food systems, the case studies demonstrated innovative public sector food procurement initiatives in four European cities – Malmö (Sweden)⁷, Rome (Italy), Copenhagen (Denmark), and Vienna (Austria); and in one region – East Ayrshire (Scotland). The background for each case study, including the scale and scope of the initiatives, details of targets met, and key impacts and outcomes of SPP implementation, includes a mix of environmental impacts (e.g. reductions in GHG emissions, increased percentages of organic food procured), the role of new City Governments as a catalyst for change, and the application of Social Return on Investment (SROI) (Table 2).

3. Results

Detailed analysis of the driving forces that led to the implementation of SPP (Table 3) shows how all five case studies implemented SPP as part of wider political strategies, and that effective facilitators at political, administrative, cultural and commercial levels were crucial for building the context. Following the Attitudes–Facilitators–Infrastructure (AFI) framework proposed by Akenji (2013), this included: supportive politicians (national and local), procurement officers and catering staff; a cultural context that supported changing provisioning routines and practices; and innovative criteria for awarding contracts that acknowledged the socio-environmental quality of the products and services offered. Appropriate infrastructure was also crucial for supporting change, such as clear political goals, the allocation of funding to support these processes within an established timeframe, and cross-departmental commitment and cooperation.

Analysis also demonstrates a split between cities where transition to more sustainable procurement began with GPP – for example, tie-in with other initiatives to reduce GHG emissions (Malmö), protecting groundwater from pesticide residues (Copenhagen), and Vienna's Climate Protection Programme – and others (Rome and East Ayrshire) that adopted a more holistic approach to sustainability from the outset, with more direct links to social and

⁵ http://www.foodlinkscommunity.net/fileadmin/documents_organicresearch/foodlinks/publications/Foodlinks_report_low.pdf (accessed 21 August 2014).

⁶ Wiki software is a type of collaborative software that runs a wiki system, allowing web pages to be created and edited using a common web browser.

⁷ <http://www.malmo.se/English/Sustainable-City-Development/Sustainable-food-in-Malmo.html> accessed 26 August 2014.

Table 2

The background and basic data on the public sector food procurement initiatives used as case studies.

In Malmö, Sweden – a city of 300,000 inhabitants – change in public sector food procurement began in 1997 with an increase in purchasing of organic food. Major change took place in 2010, when through a participatory process, a policy for Sustainable Development and Food was approved by the local government council. The policy aims to deliver good food of high quality in all public canteens and has targets for all food served in the city to be certified organic by 2020, with greenhouse gas emissions (GHG) related to food cut by 40 percent by 2020, compared to 2002 levels. At the end of 2012, 40 percent of the food budget (about nine million Euros) was spent on organic food.
The city of Rome, Italy feeds 150 thousand school children for 190 days per year, serving almost 150 tons of food per day. Food served in schools has undergone a 'quality revolution' since 1999 when a national law (Finance Law 488), reinforced by the personal interest of a Green Party mayor, created a regulatory context that encouraged many municipalities to introduce organic procurement for school canteens. School meal costs are met by a combination of fees paid by parents and municipal budgets. In the latest tendering process for the period 2013–17, the target for organic food procurement remains at 70 percent. New criteria include an emphasis on local products, sourcing produce from social co-operatives, the reduction of energy consumption, and the re-use of leftovers from school canteens.
Organic food on the public plate has been on the political agenda in Denmark since the 1990s as part of a sustainable food strategy. The city of Copenhagen has an annual food budget of 40 million Euros and 1750 kitchen employees prepare 60 thousand meals on a daily basis. Since 2009, the Organic Programme has been administered by the Copenhagen House of Food, as an independent, non-commercial foundation. The city aims to achieve 90 percent procurement of organic food by 2015. The programme has been partly supported by government strategy to develop public catering as a market for organic foods.
East Ayrshire, south-west Scotland, is a mix of urban and rural areas. It has a population of 120 thousand with higher than average levels of deprivation. East Ayrshire Council has developed and operated innovative procurement practices, prioritizing unprocessed, local and a proportion of organic ingredients for its school meals service since 2004. Procurement favours limiting the number of suppliers and building economies through scale. A key factor for change in East Ayrshire has been to configure/lot the contracts on a manageable scale that enables small and medium enterprises (SMEs) to bid for contracts. A study based on an average size local primary school (300 children) found that annual savings of 37.7 tonnes CO ₂ or 10.2 carbon (transport/distribution saving) had been achieved by localizing the supply chain. A further study using the Social Return on Investment method (SROI) calculated £6 value was returned to the local economy for every £1 spent on the project.
The City of Vienna supplies food to around 85 thousand people in hospitals, schools, kindergartens and nursing homes for the elderly. The 'ÖkoKauf Wien' ('EcoBuy') programme, with targets for organic food procurement, was launched as part of the Vienna Climate Protection Programme in 1999. For kindergartens and for 90 schools offering after-school care (30 thousand children per day) the percentage of the overall spending on organic food has already reached more than 50 percent and more than 90 percent for dairy products. Overall responsibility is with the Department of Environmental Protection but there is cross-departmental coordination through thematic working groups with members from local authorities, NGOs, municipal administrations and companies, and includes public procurement practitioners from all parts of the administration. The city of Vienna saved €44.4 million and over 100,000 tonnes of CO ₂ between 2001 and 2007 through its 'EcoBuy' programme.

Source: adapted from Barling et al., 2013.

ethical outcomes. This observation suggests that how legislation is enacted at the national level and interpreted within political strategies at the local level is a key driver for SPP. For example, although change in Rome began with national legislation that encouraged organic food procurement, the city adopted an inclusive and incremental approach and used a broader interpretation of what constituted 'quality' meals in its local schools, incorporating healthy food, local community commitment and public health education. Likewise in Copenhagen, where tools and regulations existed to meet minimum standards for GPP at the national level, there was also evidence that voluntary action and collaboration at the municipal level and between sectors resulted in more

sustainable procurement practices. These practices made the link between training for procurement officers and canteen staff, menu planning and the procurement of ingredients to support healthy eating and more sustainable diets, with public education that aimed to encourage more widespread take-up beyond the public sector canteen.

3.1. Integrating GPP and SPP priorities

Table 4 details the relationships and synergies between environmental, social/health and socio-economic criteria that took place 'on the ground'. Environmental criteria, including less meat and

Table 3

The driving forces that led to the implementation of SPP in the case studies.

Case study	Dept. responsible	Political forces	Environmental forces	Social forces
Malmö	City of Malmö's Service Dept. and Environment Dept.	<ul style="list-style-type: none"> - Political will to change; - Policy adopted across all service depts.; - Funding for training. 	<ul style="list-style-type: none"> - Tie-in with other city initiatives to reduce GHG emissions. 	<ul style="list-style-type: none"> - Involving those who prepare the food to ensure support for changing consumption routines and practice.
Copenhagen	Copenhagen House of Food, an independent, non-commercial foundation.	<ul style="list-style-type: none"> - Clear political goals and timeframe for implementation; - Finance allocated to support the process of change. 	<ul style="list-style-type: none"> - Need to protect groundwater resources from pesticides; - Targets to reduce CO₂ emissions. 	<ul style="list-style-type: none"> - Creating food literacy among children and young people; - Advocating more sustainable and healthy food consumption.
Vienna	Overall coordination: Dept. of Environmental Protection of the Municipality. Programme coordination: General Directorates of the Viennese Municipality.	<ul style="list-style-type: none"> - Commitment and cooperation of government officials across departments; - Development funding available; - International recognition. 	<ul style="list-style-type: none"> - Vienna's Climate Protection Programme. 	<ul style="list-style-type: none"> - Motivating more sustainable purchasing amongst procurement officers; - Motivating chefs to cook from scratch.
Rome	Municipality of Rome	<ul style="list-style-type: none"> - Political will to change; - Inclusive and incremental approach. 	<ul style="list-style-type: none"> - National law (1999) created regulatory context that encouraged organic procurement at municipal level. 	<ul style="list-style-type: none"> - Broader interpretation of 'quality' meals; - Innovative award criteria developed the socio-environmental quality of the products and services offered; - Food education.
East Ayrshire	East Ayrshire Council	<ul style="list-style-type: none"> - National policy and legislative support; - 'Joined-up' policy-making and local community strategy. 	<ul style="list-style-type: none"> - Strategy to promote environmental sustainability through emphasis on local food products. 	<ul style="list-style-type: none"> - Addressing health inequalities; - Food education re: impacts on health and the environment; - Building local economies.

Source: adapted from Barling et al., 2013.

organic and seasonal fresh food, were pivotal in all cases. However, these criteria did not stand alone in a 'green' purchasing box but were infused with social factors, such as criteria for sourcing fair trade products, and ingredients with high animal welfare standards and from sustainable fisheries. There were also 'trade-offs' that balanced the environmental, social and economic costs. For example, school canteens in Malmö reduced the amount of meat served and replaced it with more seasonal fruit and vegetables.

Social criteria were split between those directly concerned with diet and health to improve the quality of food served and raise nutritional standards, and others associated with socio-economic factors that affected those working within public sector catering facilities, such as education and training for catering staff and better employment practices; and others related to wider impacts, including education to raise public awareness, impacts on the local and regional economy, and fair trade.

3.2. Challenges

The findings underline the importance of maintaining political continuity in order to reach SPP policy goals. One key challenge was the interpretation of EU regulations on procurement contracts. Practical implementation meant preparing tenders to meet EU requirements whilst adapting strategies to local and cultural contexts and calibrating demand and supply of food ingredients. Valuing social (social/health and socio-economic) considerations when evaluating tenders was not made easy because of strict rules on awarding contracts on 'best value' and 'the economically most advantageous tender' (i.e. low cost). In order to overcome these market-led constraints, there was evidence of an incremental approach to change that shifted food procurement and menu planning towards healthy outcomes in all the case studies, with innovative practices that did not breach EU regulations. Examples included: dividing tenders for major ingredients into smaller

product 'lots' to enable smaller producers and suppliers to bid for contracts (e.g. East Ayrshire); and the incorporation of specific characteristics required in foods, such as certified organic (e.g. Malmö).

In addition, the findings also reveal how budgetary constraints were a challenge, especially when the cost of ingredients increased. Implementing and maintaining innovative and more sustainable procurement practices stretched from production to consumption, including: maintaining sufficient supplies; ensuring that SMEs maintained competitiveness, could manage distribution, and tender for contracts; ensuring that catering companies remained financially viable in the period of adjustment; and encouraging 'spill over' into private consumption practices. SPP was also bound up with technological capabilities, including countering the use of cook and chill systems, and with building on-site kitchens and changing fundamental principles and routines in catering facilities.

4. Discussion

The findings reflect the reality of devising and implementing innovative approaches to more sustainable public sector food procurement in Europe, the effects of cultural and political framings within national contexts, and the difficulties of practical implementation. The CoP provided the means for members to exchange and revalue their knowledge about public sector food procurement. The joint collaboration in researching and constructing the case studies provided a strong sense of ownership and was a helpful device for demonstrating the reality of SPP implementation 'on the ground'.

Recent policy reforms to support the renewed focus on green growth strategies and the emerging discourse on nutrition and sustainability raise questions about 'measuring' progress within wider systems of implementation; the next two sub-sections

Table 4
Details of the relationships and synergies between environmental, social/health and socio-economic criteria that led to practical implementation of SPP 'on the ground'.

Case study	Environmental criteria	Social/health criteria	Socio-economic criteria
Malmö	<ul style="list-style-type: none"> - Certified organic food and associated environmental benefits; - Less meat; - Sustainable fishing; - Seasonal food. 	<ul style="list-style-type: none"> - Healthy food of high quality in all public canteens. 	<ul style="list-style-type: none"> - Budgets for training catering staff; - Continuous work with and training for catering staff about why and how they should change their way of purchasing and cooking; - Sourcing of fair trade products.
Copenhagen	<ul style="list-style-type: none"> - Organic food procurement targets; - Less meat; - More fresh, seasonal and local vegetables and fruits; - Less food waste. 	<ul style="list-style-type: none"> - Healthy food as part of the urban sustainable development programme. 	<ul style="list-style-type: none"> - Education and training for catering staff – the principle of the 'Organic Kitchen'.
Vienna	<ul style="list-style-type: none"> - Organic production; - No genetic modification; - Less meat; - Seasonal and organic fruit and vegetables; - Fish from sustainable sources; - No packaging of meals. 	<ul style="list-style-type: none"> - Emphasis on healthy eating; - 'Naturally good plate' that includes one third regional ingredients and high animal welfare standards; - Reduction of trans-fatty acids. 	<ul style="list-style-type: none"> - Emphasis on regional impacts; - Sourcing of fair trade products.
Rome	<ul style="list-style-type: none"> - Mandatory list of organic products; - Seasonality and territoriality; - Lower food miles; - Less food waste; - Recycling. 	<ul style="list-style-type: none"> - PDO/PGI products; - Varied and nutritious menus 	<ul style="list-style-type: none"> - Criteria and budgets to improve kitchens and eating environments; - Education projects involving teachers and parents; - Training for staff; - Sourcing fair trade bananas and chocolate bars.
East Ayrshire	<ul style="list-style-type: none"> - Seasonality, freshness and localness; - Responsible use of resources; - Lower food miles. 	<ul style="list-style-type: none"> - Better quality meals; - Public health and nutrition. 	<ul style="list-style-type: none"> - Investment in the local economy; - Better employment practices; - Improved links with education and community learning.

Source: adapted from Barling et al., 2013.

explore this within the context of life cycle assessment methodologies, EU legislative reform, and sustainable diets.

4.1. Beyond 'green'

The case studies demonstrate how public procurement can lead to quantifiable outcomes (e.g. through lower GHG emissions) and there is evidence that initial financial outlay had been countered by savings made in other areas, supporting Rimmington et al's (2006) argument that 'what gets measured gets managed.' However, systems and indicators require further development if they are to incorporate full life cycle costs that are tailored to local contexts and that are not too complex to manage within urban governments, if progress is to extend procurement beyond green purchasing and create more sustainable food systems and better public health nutrition. As has already been recognized, methods and techniques to measure environmental impacts of products using LCA are more advanced and the evidence base is stronger, whereas system boundaries for 'measuring' the environmental footprint of organizations as procurer are only in the early stages of development (Pelletier et al., 2014), as are methodologies that integrate social impacts into LCA methodologies (Smith and Barling, 2014).

Equally, although the dynamic between policy and practice is constantly evolving as urban governments assume more authority and responsibility for sustainable development, the findings show that transition to more sustainable procurement is very dependent on political will and leadership and an infrastructure that is able to balance the complexity of the inter-relationships between economic, environmental and social drivers to effect change. The reforms to EU directives on procurement (2014) – that aim to address the perceived lack of clarity between social and environmental criteria – must be implemented at the national level by April 2016. These new rules and procedures, including the right to value social goals when evaluating tenders and the use of full life cycle costing, pick-up on innovations implemented by urban governments in the case studies. However, given the overall market-led EU policy framework, a lack of political ambition to move beyond GPP appears likely to remain in the foreseeable future.

4.2. Impacts on nutrition and public health

All the case studies demonstrated an increase in the procurement of better quality food, including organic, seasonal and local fresh food. This is in-line with current discourse on sustainable diets to promote foods with less environmental impacts and eating perishable produce in season. However, there were anomalies, such as when the 'trigger' for change came from environmental initiatives (Malmö, Copenhagen and Vienna). In these instances, meeting organic 'targets' often meant sourcing imported food through central suppliers that resulted in 'trade-offs' between environmental, social and economic costs. As Akenji (2013) puts it, these differences between GPP and SPP might seem semantic, but for policymakers and practitioners these 'trade-offs' have serious implications for interpreting more sustainable food procurement and for implementing processes and practices associated with sustainable diets.

5. Conclusions

The findings underline the need to explore how consistent definitions for green and sustainable public sector food procurement can be refined and standardized in order to support governments at all levels in reviewing and analyzing their current food procurement strategies and practices to improve sustainability. Clarifying the difference between GPP and SPP, with political

continuity that supports and enables policymakers and practitioners to take an incremental approach to change, would make an important contribution to delivering more sustainable food systems and better public health nutrition.

The research shows that there is a scarcity of data and indicators for SPP and there is a need for further research studies to gather empirical data in order to compile an evidence base on the scope and scale of food procurement schemes. This includes the mechanisms employed (what works), the tangible benefits for sustainability and how these are extended and mobilized in the wider society.

More broadly, the future trajectories of green growth strategies and sustainable diets need to converge in order to further understanding of how human health is interwoven with the health of eco-systems and deliver sustainability goals.

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Agenda Item 3

HCC evidence

for the Climate Change, Environment and Rural Affairs Committee

Inquiry into Rethinking Food in Wales

18 October 2017

Hybu Cig Cymru – Meat Promotion Wales (HCC) is the strategic body responsible for the development, marketing and promotion of the Welsh red meat industry. Its mission is to develop profitable and sustainable markets for Welsh Lamb, Welsh Beef and pork from Wales. HCC welcomes the opportunity to provide a written submission to the inquiry ‘Rethinking Food Policy in Wales’ and is supportive of the principles.

The red meat sector (sheep, cattle and pigs) is an important primary production industry in Wales. Beef and sheep producers represent 31 percent of active Welsh holdings (2016)¹ and Welsh red meat production contributes the largest share towards Welsh Agricultural Output. Welsh red meat production alone accounts for 43 percent of the total Welsh Agricultural Output is worth £634 million (2015).²

The Strategic Action Plan for the Welsh Red Meat Industry (Twenty Twenty Vision), which was launched by the Welsh Ministers in 2015, seeks to deliver a profitable, efficient, sustainable and innovative industry which benefits the people of Wales; which is resilient to political and environmental change, and is capable of responding competitively to ever changing market trends. A key strategic objective of the Action Plan, in relation to ‘Brand Wales’, is that of “increasing sales revenue from Welsh red meat”, which is focussed in the Action Plan on UK retail, export and UK foodservice sales.

Welsh Red Meat Brands

The long-term branding strategy for beef and lamb is inextricably linked to the coveted PGI status of Welsh Lamb and Welsh Beef. This widely-recognised status gives the consumer the highest possible confidence in the provenance and traceability of produce. Welsh Lamb and Welsh Beef were granted Protected Geographical Indication (PGI) status by the European Commission in July 2003 and November 2002 respectively and HCC considers the status of PGI to be of enormous economic importance to the Welsh red meat industry, as they identify the origin and unique qualities of both Welsh Lamb and Welsh Beef.³

In order to fulfil its responsibilities and to ensure that the integrity of the PGI Welsh Lamb and PGI Welsh Beef designations are protected, HCC has implemented a verification scheme for abattoirs and cutting plants. This scheme provides for strict control and monitoring to ensure that only lamb and beef which meet the specifications is labelled as Welsh. An independent certification body is responsible for the enforcement of the designations in abattoirs and cutting plants, on behalf of HCC, where an inspection of the traceability and meat sourcing systems is undertaken

¹ **Source:** Welsh Government. Farming Facts and Figures, Wales 2017.

² **Source:** Welsh Government. Agriculture in the United Kingdom 2016, DEFRA

³ The EU Protected Food Name Scheme identifies regional and traditional foods whose authenticity and origin can be guaranteed. Under this system a named food or drink registered at a European level is given legal protection against imitation throughout the EU. PGI products are produced or processed or prepared within a specific geographical area, and with features or qualities attributable to that area.

annually in addition to unannounced verification checks at 25 percent of members annually. Control and monitoring throughout the rest of the supply chain is undertaken by local authority Trading Standards Officers.

Retail Market

The Welsh red meat sector is heavily dependent on domestic markets (particularly England) and relies on continuing promotional endeavours to both retain existing markets and to establish new markets for PGI Welsh Lamb and PGI Welsh Beef. Of the red meat produced in Wales, five percent is consumed in the home (Wales) market. Approximately 60 percent of the sheep meat and 80 percent of the beef produced in Wales is consumed elsewhere in the UK. The importance of the PGI Welsh Lamb and PGI Welsh Beef brands in these domestic markets is enormous, as it provides a unique point of difference in an already oversupplied market, building on growing consumer interest in provenance and traceability.

Export Market

Of the red meat produced in Wales, approximately 35 percent of the sheep meat and 15 percent of the beef produced services the export markets. The combined total value of both sheepmeat and beef exports from Wales in 2016 was approximately £161 million. The export of sheep skins, cattle hides and offal from Wales equated to approximately £10 million bringing the total value of red meat exports from Wales in 2016 to approximately £171 million.⁴

The Welsh red meat industry is heavily reliant on export markets to achieve premium prices. Strong overseas demand uplifts farm gate prices and helps to balance supply and demand thus securing greater returns for the supply chain. The value of the red meat branding in these export markets is critical, as it provides growth opportunities for Welsh red meat and these worldwide markets are increasingly seeking products with quality credentials (such as PGI).

Procurement

In line with the Strategic Action Plan for the Welsh Red Meat Industry, a key HCC objective is to develop mechanisms to increase the volume of branded Welsh red meat available in order to achieve retail premium in foodservice. There is a need to develop a food culture by better linking production back to consumers and working with every section of the supply chain. There is also a need to ensure procurement contracts seek best value in products, measured by both cost and quality. HCC believes that one way of ensuring an integrated food sector is to encourage procurement of Welsh red meat amongst the Welsh public sector, thereby supporting the local rural economy, environment and communities. The use of model clauses and specified use of PGI Welsh Lamb and PGI Welsh Beef in procurement contracts would strengthen consumer perception of public bodies as supporting the local economy. The National Procurement Service (NPS) for Wales is now using its combined purchasing power in the public sector across Wales, seeking to find the best available deals and this provides opportunities for strengthening the sourcing of local products (including Welsh red meat).

⁴ **Source:** HCC. Calculated using HM Revenue and Customs data, 2016.

Value of the Welsh Red Meat Brands

Since achieving PGI status and using it as a cornerstone of marketing and promotional activity, exports of Welsh Lamb and Welsh Beef have grown substantially. In the UK market, in the 10 years immediately following securing the protected food name status, Welsh red meat experienced an increase of £64 million in retail market share, and an increased retail premium of at least £1 million per year. The value of sheepmeat and beef exports from Wales also benefited from the branding - it grew from £60 million in 2004 to £200 million in 2011. The public sector meanwhile is estimated to have achieved an additional £8.4 million (2005-2013) as a result of the combined work of HCC and industry alongside the PGI branding.⁵ Clearly, good progress has been made over the last decade in establishing the brands, gaining acceptance, increasing take up and developing markets at home and abroad. There is now scope to increase the brand potential further and to work with industry in achieving even greater market share for Welsh red meat brands.

⁵ **Source:** HCC. Flying the Flag: Decade of Success for the Welsh Red Meat Brands. 2013.

Agenda Item 4

Climate Change, Environment and Rural Affairs Consultation on Rethinking Food in Wales A response from the Food and Drink Federation (FDF)

The Welsh Government has ambitious targets to grow our food and drink industry and raise the profile of food and drink from Wales. Also, the decision to leave the EU will create both challenges and opportunities for the industry.

The Climate Change, Environment and Rural Affairs Committee is carrying out an inquiry into what we can do to enhance the food and drink sector and our relationship with the food we eat.

We are therefore asking what the future for food and drink could be.

What is your vision for the future of food in Wales and what needs to be done to achieve it?

How can we rethink food so that we have:

- **Healthy, locally produced food that is accessible and affordable;**
- **An innovative food industry sustaining high quality jobs;**
- **Sustainably produced food with high environmental and animal welfare standards; and**
- **An internationally renowned destination for food lovers?**

Please feel free to let us know any other issues which you feel are relevant.

2,000 words, numbered paragraphs, references hyperlinked

Introduction

1. The Food and Drink Federation (FDF) is the voice of the UK food and drink industry – the UK's largest manufacturing sector. The Food and Drink Federation (FDF) represents and advises **food and drink manufacturing firms** across the United Kingdom, including leading brands and home-grown businesses, large and small. We are central to the economy and to food security, providing consumers with a fantastic array of safe, affordable and nutritious food and drink every day. As producers, we sit at the heart of a £110 billion 'farm to fork' industry which employs four million people
2. Food and drink in Wales is an economic success story and now employs over 22,000 people in over 550 businesses across the country, with a turnover of £4.8bn a year. It contributes more than £260 million in Welsh exports, and invests more than £4 million in innovation, research and development. The productivity performance of Welsh food and drink manufacturing has increased steadily since 1997 and remains higher per employee than in the UK as a whole. But its significance goes far beyond money. Food and drink has become a vital part of Welsh national identity.
3. However, as the sector the most impacted by Brexit, food and farming has much at stake in the negotiations. It is vital that we secure the right outcomes which ensure that we can maintain the quality, choice, and value that consumers demand. We cannot afford a 'cliff edge' scenario and FDF urges interim and transitional arrangements that will apply until any new arrangements are in place (without the need for two different adjustments), to protect our sector's successes and long term investment. We have asked the UK Government to counterbalance any uncertainty with incentives to support growth through an Industrial Strategy sector deal, and we

urge the Welsh Government to continue its support for the sector to ensure its continued success in Wales.

4. FDF's presence in Wales – FDF Cymru – works with key industry partners including David Lloyd, Director of the ZERO2FIVE Food Industry Centre at Cardiff Metropolitan University, and Andy Richardson, Chair of the Food and Drink Industry Board for Wales. Our Corporate Affairs Director Tim Rycroft, has been invited to sit on the Cabinet Secretary for Agriculture's Brexit Trade and Supply Chain Working Group.
5. This document sets out our priorities for a sustainable future for Welsh food and drink, as well as our desire for a clear agenda for the development of a new relationship with the EU which recognises the strategic importance of our industry to Wales and the UK.

Towards Sustainable Growth

6. FDF is delighted to support the Welsh Government's aim to grow output for the sector by 30 per cent to £7 billion by 2020 and increase the profile and reputation of Welsh food and drink, in its document 'Towards Sustainable Growth: An Action Plan for the Food and Drink Industry 2014-2020'. It is welcome that in November 2016, Lesley Griffiths Cabinet Secretary for the Environment and Rural Affairs, noted the progress made already in reaching that target, and that the industry's sales value in Wales has already grown to £6.1bn.
7. In July 2017, FDF commissioned Grant Thornton to undertake an independent research project identifying both the opportunities available to food and drink manufacturers and the barriers to growth across the UK. This research focuses on three core areas: innovation, trade and skills and will shape FDF's work to deliver an Industrial Strategy sector deal for food and drink in partnership with the UK Government.
8. As an industry, in response to the UK Government's Industrial Strategy Green Paper, we are developing a sector deal proposal which will add economic and societal value through the following priorities:
 - Investing in science, research and innovation for health and productivity improvements;
 - Addressing fragmentation of specialist food and drink export support to drive SME export growth and fulfil industry's export potential; and
 - Developing skills to improve workforce self-sufficiency and productivity improvements.
9. We welcome the ongoing consultation and engagement with the food and drink industry to inform the Welsh Government's vision for the post-Brexit future. FDF's priorities for the negotiations are five-fold:
 - Immediate action to guarantee the right to remain for valued EU citizens, and in the medium term, access to the skills and talent we need to address our sector's skills gap (which was already significant before the EU referendum as a result of demographic trends).
 - Recognition of Ireland's special circumstances.

- Zero-tariff and frictionless trade across borders.
 - Stable regulatory framework to maintain consumer confidence in the safety and authenticity of UK food and drink.
 - A transition or implementation period that allows business to make only one adjustment to a new way of trading/operating.
10. At a time of great change and business uncertainty, it is vital that the Welsh Food and Drink industry is supported by Welsh Government and treated as a priority sector. FDF Cymru remains willing to continue our work with Welsh Government and the Food and Drink Industry Board for Wales to ensure this.

Workforce: Maintaining the flow of talent and skills into the industry

11. Ensuring the nation can be fed must be a high strategic priority for the Welsh Government. The people working across our supply chain are essential to what UK consumers eat and drink. As a sector we welcomed the announcement from the Prime Minister in June 2017 regarding safeguarding the position of EU citizens living in the UK and UK nationals living in the EU and we urge negotiators on both sides to resolve the matter swiftly.
12. FDF leads an EU Exit workforce group, with farming, food retail and hospitality bodies. Our joint August 2017 report 'Breaking the Chain' revealed that an abrupt reduction in the number of workers from the EU able to work in the UK after Brexit would cause significant disruption to the whole food and drink supply chain.
13. Almost half (47%) of businesses surveyed said EU nationals were considering leaving the UK due to uncertainty surrounding their future, and over a third (36%) said they would become unviable if they had no access to EU workers. The report made a number of recommendations to Government, including reviewing the recording of immigration data, increasing efficiency through adequate Home Office resourcing and investment in skills provision.
14. While companies are working hard to build their pipeline of home grown talent, achieving this significant step change will take time. With record high levels of employment in key geographical locations, it is often a question of local labour availability for the roles we are seeking to fill. Our sector already faced a large skills gap due to demographic change. Across the UK, we will need 140,000 new skilled workers by 2024. Future migration policy must ensure that industry has access to the workers it needs to address our skills gap, and that the food and drink industry in Wales – and across the UK gets its fair share.

International Trade: A prosperous and secure future through international trade

15. The EU is a vital market for UK food and drink. Once Free Trade Agreements (FTAs) are accounted for, our research shows that 94 per cent of exports and 97 per cent of imports of food and non-alcoholic drink are with the EU, or with countries with which the EU has signed or is negotiating a trade deal.
16. There is also an inter-dependency of food between the nations of Great Britain, Northern Ireland and the Republic of Ireland and consideration must be given to the fact that many of those exports/imports come through the North and South Wales

ferry routes to Ireland. Data from the Value of Welsh Food and Drink report shows that 88 per cent of all exports in 2015 from Wales were to the EU, worth £264 million in 2015.

17. FDF member companies are committed partners of our domestic agriculture industry, however they also often need to import ingredients that are not produced in the UK or are not produced in sufficient quantity. To meet consumer demand, our industry must have access to sufficient supplies of safe, high quality, and competitively priced raw materials.
18. We welcome the UK Government's desire for a deep and comprehensive trade agreement with the European Union. However, until such a trade deal has been agreed, ratified and enters into force, we will need transitional arrangements to ensure businesses have continued access to vital imported ingredients and export markets.
19. Ensuring a single point of change would help to minimise unnecessary disruption for businesses that have established trading relationships with the EU. FDF is currently preparing detailed input to the UK Government on the two proposed models as set out in the most recent Customs Paper which would each pose specific issues for food and drink manufacturers.
20. The challenge will then follow in designing and negotiating a model that maintains these benefits beyond the transition period, delivering the same ease of trading that UK food and drink currently enjoys with the EU27, with zero tariffs and no new regulatory or other non-tariff barriers.
21. A no-deal scenario could pose a real threat to trade in our industry's products. While EU applied tariffs for non-food goods average only 2.3 per cent, food and drink would face tariffs entering the EU averaging 22.3 per cent. Even under the EU's WTO Most Favoured Nation (MFN) status, tariffs for agrifood and drink are on average significantly higher than for other trade in goods, with peaks of more than 100 per cent on fruit, vegetables, meat, oilseeds, sugars and confectionery and beverages.
22. Food is part of our critical national infrastructure and 'just in time' (JIT) supply chains mean empty shelves in four days or fewer if supply is delayed or interrupted. Most food has a limited shelf life and some is highly perishable.

Regulatory Stability: Ensuring consumer and industry confidence

23. Maintaining consumer confidence in the safety and authenticity of UK food and drink is paramount for industry. Common regulatory and legal requirements informed by sound science and evidence allow companies to do business and trade on a level playing field, while also protecting consumers. However, where EU regulation creates barriers and burdens that limit businesses' ability to innovate, we believe improvements can be made.
24. The production, processing, distribution, retail, packaging, and labelling of food and drink is governed by a wealth of laws, regulations, codes of practice, and guidance - the majority of which are set at an EU level. Professor Tim Lang, Professor of Food Policy at City University London estimates that 80 per cent of our current food legislation will need to be re-drawn. Businesses therefore need a clear roadmap setting out how the UK Government in partnership with devolved Governments will manage the exit process in the complex area of food legislation.

25. The existing EU regulatory framework facilitates trade on a level playing field and allows Welsh businesses to access the Single Market. Industry needs to be assured that mechanisms will be put in place to ensure mutual recognition of potentially different regulatory systems, without the need for Export Health Certificates, burdensome customs barriers, and other non-tariff barriers.
26. The UK Government has indicated it is considering the role of EFSA, alongside other bodies. FDF would want to continue to have access to EFSA's expertise. Any proposed changes to food and drink regulation as between the UK and EU – and across the devolved Governments of the UK – should be subject to detailed consultation with industry. Both the Welsh and UK Government should also continue to play an active role in ongoing EU policy negotiations then be revised or revoked by the UK Government, or introduced by the EU after the UK has left.
27. The Cabinet Secretary has recognised the necessity of promoting Welsh food and culture, as well as the value of the EU protected food name scheme of which 14 Welsh products are currently registered. Food and drink producers highly value the role geographical indicators have played in celebrating quality and provenance, but Brexit may have an impact on our ability to use the existing EU geographical indication schemes. FDF is therefore seeking reassurance, for manufacturers and consumers alike, that matters are in hand to protect these products post-Brexit.

Improving Public Health: Working together to tackle obesity

28. Food and drink manufacturers take our responsibility to help consumers make informed diet choices and achieve healthier lifestyles very seriously. We agree with leading experts that there is no silver bullet to tackle the complex issue of obesity and diet-related diseases. Success is dependent on many co-ordinated interventions across the entire food chain and in homes, communities and workplaces.
29. As an industry, we are proud of our record to date; from voluntary salt reduction, virtual elimination of artificial trans fats, and now a world-leading sugars reduction programme.
30. FDF has also taken the initiative in other spheres, such as our support in 2015 to bring advertising in digital media in line with current broadcast restrictions. Given children's changing viewing habits, we believed it was right to support a change to the rules so as of July 2017, adverts for products high in fat, salt and sugars can no longer be shown in children's media online.
31. We agree with dietitians that it is wrong to focus on one single nutrient or ingredient and that we must look for a 'whole diet and lifestyle' solution. The emphasis should be on calories, as undue focus on any one nutrient risks misleading the consumer. Ahead of the Welsh Government's new Obesity Strategy, FDF would urge a holistic reformulation programme, with calorie reduction at its heart.
32. Reformulation takes time, involves technical challenges and incurs great costs. Pre-competitive research support remains vital to help keep new product prices competitive, ensuring these are truly affordable to all and helping to alleviate health inequalities. We urge the Welsh Government to continue supporting research and innovation in the sector for example through the food innovation centres based across the country which support small and medium sized businesses with reformulation and other activities to improve public health.

Conclusion

33. The food and drink industry is a critical part of the Welsh and UK economy. There is no doubt that a changed relationship between the UK and EU, as well as the continuing pressures on the sector through pressures in our workforce, trade, regulation, sector growth, and in public health could have a strong impact on the industry in Wales.
34. We strongly agree with the importance placed by the Cabinet Secretary of the industry both to the economy, and to the country's tourism industry. FDF and FDF Cymru is therefore keen to work with the Welsh Government and the National Assembly for Wales to ensure that the Welsh and UK food and drink manufacturing sectors continue to be a national and international success story.



Mike Hedges AM
Chair
Climate Change, Environment and
Rural Affairs Committee

17 October 2017

Dear Mike

I wish to update the Climate Change, Environment and Rural Affairs Committee (CCERA) members in relation to recommendation 21 of your report on the 'Future of Land Management in Wales' dated March 24th 2017.

Recommendation 21 requested:-

The Welsh Government should aim to increase public procurement of Welsh produce and should report to this Committee within the next six months on current levels of procurement and its plans for the future.'

The National Procurement for Wales (NPS) has been working with the Welsh Public Sector to put in place a number of procurement agreements for the delivery of fresh food produce and packaged food produce.

The fresh food produce agreement targeted the following products.

- Fresh and frozen meats.
- Fresh fruit, vegetables and salads.
- Fresh milk, fresh dairy products and eggs.
- Bread, rolls, cakes and morning goods
- Chilled ready to eat foods.

The packed food produce agreement targeted the following products.

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400
Gohebiaeth.Lesley.Griffiths@llyw.cymru
Correspondence.Lesley.Griffiths@gov.wales

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.

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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.

- Ambient and frozen products.
- Ambient groceries.
- Frozen products.
- Soft beverages, bottled water, confectionery and crisps.

The procurement model was designed to meet the varying needs of the Welsh Public Sector and also let on a zonal basis to encourage participation from Welsh based suppliers.

In addition, particular emphasis was placed on developing Welsh based sources of supply with appropriate key performance indicators included to allow monitoring of supplier performance.

Where distributors won contracts it was stressed the NPS would work with them to provide a route to market for local food and drink producers and promote Welsh produce.

Both procurements have been designed to deliver outputs that embrace all Well Being of Future Generation Act (2015) goals and fully embrace highly robust food safety controls delivered nationally through an external food safety accreditation agency.

Current status – Fresh Food Produce

The fresh food produce agreement was let in September 2017. Work is ongoing to mobilise the agreement with a number of major Welsh public sector bodies

80% of the suppliers appointed to the agreement are Welsh based organisations.

All bidders were evaluated against a number of key criteria including their capability to source and market local Welsh produce

Amongst a number of Key Performance Indicators (KPIs) set out to monitor supplier performance the NPS will be measuring and working with suppliers to increase their performance in relation to

- Provenance of products
- Locally sourced seasonal produce

Current status – Packaged Food Produce

The packaged produce agreement procurement is on going. Submissions are currently under evaluation and the agreement will be awarded in November 2017.

Next Steps

The committee is invited to consider receiving performance updates on a six monthly basis.

Regards
Lesley

Lesley Griffiths AC/AM

Ysgrifennydd y Cabinet dros yr Amgylchedd a Materion Gwledig
Cabinet Secretary for Environment and Rural Affairs

Cabinet Secretary for Environment and Rural Affairs Lesley Griffiths
Welsh Government
5th Floor
Tŷ Hywel
Cardiff Bay
CF99 1NA
August 18th 2017.

Dear Minister.

Following the inquiry by the Climate Change, Environment and Rural Affairs committee assessing the delivery of the Woodlands for Wales strategy and the subsequent publishing of the report “Branching out: a new ambition for woodland policies”, we thank Welsh Government and the committee for their time and effort in compiling this report.

The committee make a number of recommendations in the report which we support and we propose that the sector and WG work together to deliver agreed outcomes.

We welcome the report and believe it confronts issues that have previously been ignored and seeks answers to questions which have, to date, been avoided. It is forthright in its findings and recommendations and calls on WG to address the identified shortfalls.

Members of the Confor Wales Committee represent a wide cross section of the woodlands and forestry sector in Wales and they all support the requests in this letter. Specifically, we ask that as minister you:

1. Accept the recommendations of the report in full and promptly set out a timetable for actions to resolve the issues they raise.
2. Work with the sector and stakeholders and actively help facilitate a resolution that will implement the recommendations in the report.
3. As an interim measure, commit to restructuring the Glastir Woodland Creation Scheme, limiting the eligibility criteria to complying with UKFS (which includes timber production), aimed at substantially increasing woodland and forestry creation in Wales.

I look forward to hearing from you.

Yours sincerely

Martin Bishop Confor Wales Manager on behalf of the Confor Wales Committee including:

Mike Harvey, Maelor Forest Nurseries Ltd.
Andrew Bronwin, Andrew Bronwin & Co Ltd.
David V Edwards Tilhill Forestry.
Charles Gittins and Alastair Squire, Flintshire Woodlands.
Tim Kirk, Forest Valuations.
John Searl, John Searl Forestry Ltd
Chris Emery, Kronospan.
Graham Taylor MBE and Arthur Wiggins, Pryor & Rickett Silviculture.
George Johnson, Coed Trallwm woodlands
Kyle Williams, Pontrilas Sawmills.
Hugh Wheeldon, Hugh Wheeldon & Co
Roger Cooper.

Martin Bishop, National Manager for Wales, Rheolwr Genedlaethol i Gymru .

Agenda Item 5.3



Confor
Promoting forestry and wood
Hyrwyddo coedwigaeth a choed

Cabinet Secretary for Environment and Rural Affairs Lesley Griffiths
Welsh Government
5th Floor
Tŷ Hywel
Cardiff Bay
CF99 1NA
August 24th 2017.

Dear Minister.

We warmly welcome the inquiry by the Committee on Climate Change, Environment and Rural Affairs into the Woodlands for Wales strategy, and the subsequent publication of the report “Branching out: a new ambition for woodland policies”.

The report tackles issues that have previously been ignored and asks questions that needed to be asked. It is forthright in its findings and recommendations, calling on the Welsh Government to address the shortfalls it identifies.

We thank the Committee and the Welsh Government for their time and effort in compiling this report. It is essential that the sector and Welsh Government work together to follow up on the report.

We ask that as Minister you:

1. Accept the all the findings and recommendations of the “Branching out: a new ambition for woodland policies report”.
2. Present a clear plan for implementing the recommendations of the report, with timescales, and provide Natural Resources Wales with the resources it needs to implement those recommendations and enable the private forestry sector to do so.
3. Specify a target area/volume for both non-commercial and commercial woodland creation that will give Welsh companies confidence that the raw material crucial for their businesses will be available in the future, thus enabling and encouraging them to invest in Wales.

Martin Bishop.

Confor National Manager for Wales representing timber processing companies.

Confor Wales represents a wide cross section of the woodlands and forestry sector in Wales including the timber and wood processing companies listed below who rely on the timber products from Welsh forests as the raw material essential to their businesses. These companies employ many thousands of Welsh employees directly, creating products from Welsh wood which also supports many more jobs in the supply chain throughout rural Wales.

Martin Bishop, National Manager for Wales, Rheolwr Genedlaethol i Gymru .

www.confor.org.uk

Confederation of Forest Industries (UK) Ltd. Registered office: 59 George Street, Edinburgh EH2 2JG

Pack Page 34





Confor

Promoting forestry and wood
Hyrwyddo coedwigaeth a choed

A E Evans Ltd

BSW.

Charles Ransford & Son Ltd

Clifford Jones Timber.

Esgair Timber.

G & T Evans

James Davies.

Kronospan Ltd

Llandre sawmill.

M&M timber

Pontrilas Sawmills.

Premier Forest products.

Western Bio Energy (fuels) Ltd

Woodknowledge Wales. Well done – this feels like progress.

Martin Bishop, National Manager for Wales, Rheolwr Genedlaethol i Gymru .

www.confor.org.uk

Confederation of Forest Industries (UK) Ltd. Registered office: 59 George Street, Edinburgh EH2 2JG



Wood for Good

Agenda Item 5.4



✉ Coed Cadw
The Woodland Trust
Llys y Castell
6 Heol yr Eglwys Gadeiriol
Caerdydd CF11 9LJ

Castle Court
6 Cathedral Road
Cardiff CF11 9LJ

☎ 0292 002 7732

🌐 coedcadw.org.uk
woodlandtrust.org.uk

Mike Hedges AM, Chair
Climate Change, Environment and Rural Affairs Committee
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

8th September 2017

Dear Mr Hedges

Coed Cadw – The Woodland Trust response to the Welsh Assembly Climate Change, Environment and Rural Affairs Committee (CCERA) report “Branching Out: a new ambition for woodland policies” (July 2017)

We greatly welcome the Committee’s report and are largely supportive of the Committee’s recommendations in particular those relating to:

- long term targets for increasing tree cover (recommendations 1-3) ;
- ensuring a minimum of 20% urban tree cover (4);
- using woodland for community regeneration (5);
- improvements to public access provision including incentivising land owners to enable recreational access to their land (6)
- the strong endorsement of the UK Woodland Assurance Standard (10)
- basing future funding for land and forest managers on delivery of sustainable outcomes.(13)

If we have a reservation it is on the potential for the report to be used to argue in favour the expansion of commercial soft wood afforestation at the expense of other policy outcomes highlighted as desirable. This risks encouraging a long embedded inclination in production forestry to discount the environmentally damaging impacts of commercial forestry on water quality, soil conservation and biodiversity, and thereby undermine regulatory oversight.

In relation to recommendations 1 to 3 on woodland expansion and recommendations 8 and 9 on supporting the commercial forestry sector we are generally supportive of the intentions.

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Continued...

We do not support the view strongly advocated by some in the commercial forestry sector that softwood production volumes must be guaranteed irrespective of sustainability or consequences for other policy objectives and stakeholders. Nor do we support the backward looking focus on preventing landscape change or unwillingness to recognise the sustainability and environmental case for the production of more sustainably produced timber.

What we think needs to change

- There is a need to create real cash income streams for forest owners who deliver non-timber benefits, otherwise the imperative to produce softwood at the expense of other outputs will continue.
- There is a need in the environmental sector to accept that change is justified and beneficial in some landscapes in Wales, including the planting of commercial woodland, and that this will have impacts on some species. Preservation of landscapes of pre-mechanisation farming on an extensive scale is not sustainable or desirable.
- There is a need in the commercial forestry sector to accept that commercial woodland has to be much more diverse and that this will challenge current forestry business models which are dependent on high volume single species production.
- The Welsh Government and the forest industry needs to unequivocally back the independent audits of sustainability that are available through the UK Woodland Assurance Scheme (UKWAS), and applied to the Welsh Government and Woodland Trust estates, and which provides forestry with a sustainability certification that no other land use sector can match. The UK Forest Standard (UKFS) as promoted by Government is not auditable and is no substitute for the independently audited UKWAS sustainability standard.
- Commercial forestry and agriculture cannot expect to continue to externalise their costs and impacts onto other stakeholders, for example in terms of air and water pollution and loss of biodiversity.
- Forestry and agriculture needs to work closer together to realise the benefits and synergies of integration. Agro-forestry is one option which the Welsh Government needs to explore in more detail, particularly in developing a sustainable land use management policy post CAP.

A Way Forward

Coed Cadw – the Woodland Trust strongly believes that any future forestry policy should be part of a sustainable land management policy that covers all rural land in Wales. We believe that there remain misconceptions about the benefits of multi-purpose forestry expansion and that in order to tackle this there is a need for these benefits to be demonstrated on the ground by establishing one or several large new “forests” in Wales. These will be extensive areas of partially forested landscape which demonstrate much more diverse and better designed approaches to commercial afforestation within a landscape matrix that includes secured and managed habitat and some continued farming. These target areas will need to be in locations where there are substantial areas of lower grade farmland free of constrictive designations. The Government will need to provide a compelling incentive scheme that persuades investors and a majority of landowners to participate and provides support for a range of landscape management interventions and not just for new forest planting. An integrated multi-purpose whole forest plan will be required, prepared and delivered under strong leadership.

The Trust is participating in a bid led by CONFOR under the WG co-operative forest planning scheme which we hope may take a step towards identifying such locations, but further work may be required.

We do not believe that a negotiated compromise between competing stakeholders is going to be possible without strong leadership from the Welsh Government; particularly given they are the predominant forest owner in Wales. We do not believe that NRW can provide this leadership as they do not set the objectives for the public forest estate and are compromised by combining forest management and regulatory functions. Coed Cadw welcomes the committee’s report into the future of forestry in Wales as an important contribution to the discussion on how we deliver a fully sustainable and integrated future for our precious environment.

Yours sincerely



Jerry Langford
Director Wales

C.C. Lesley Griffiths, Cabinet Secretary for Environment and Rural Affairs

Page 3 of 3

Lesley Griffiths AM
Cabinet Secretary for Environment and Rural Affairs
Welsh Government

16 October 2017

Dear Lesley,

Branching Out: a new ambition for woodland policies

Thank you for your response to the Committee's report. I am grateful for the way you engaged the Committee during the course of this inquiry.

Although the Committee felt that your response was generally positive, members agreed that I should write to you to seek further information on several matters you raise in your response.

Recommendation 1: The Welsh Government must, as a matter of urgency, refresh its woodland strategy with the aim of significantly increasing planting rates. The refreshed strategy must include long term targets for woodland cover and must incorporate commercial forestry.

Welsh Government response: Accept in Principle

The Committee is pleased that this recommendation has been accepted in principle and that there will be a review of the strategy in 2018. However, one of the key messages in our report was the severe lack of new woodland creation in Wales. It is extremely unlikely that the Welsh Government will meet its target of 100,000ha of new woodland creation for 2010-2030 without a fundamental change in approach.

In the first 6 years to which this target applies (2010-16), Wales created just 3,500ha of new woodland. To meet your target of 100,000ha of new woodland creation, Wales will need to create 96,500ha during the last 14 years of the scheme. Continuing in the same vein is not an option.

What do you intend to do differently to address the significant planting shortfall you face?



Recommendation 2: The Welsh Government must address the barriers to increasing planting, in particular by:

- Aligning the regulatory and funding processes, and providing additional guidance and support to applicants.
- Examining the potential for adopting a presumption of approval for applications in areas identified by the Woodland Opportunities Map as having a high suitability for woodland.
- Making the Woodland Opportunities Map more user-friendly to a range of different user groups, and linking it in with the land use planning system.

Welsh Government response: *Accept in Principle*

In your response, you state that the Welsh Government is working closely with NRW to improve alignment of regulatory processes, in particular, the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999 (as amended) with the Glastir Woodland Creation application process, to facilitate the successful progression of woodland creation proposals. Please provide details of any assessment you have made of the impact this work will have on improving planting rates. Could you also tell us when this work, and the work on improving the application process, will be completed?

Your response indicates that you are aiming to use the Woodland Opportunities Map to provide applicants with more certainty about whether a proposal is likely to be approved. Could you provide the Committee with further information on this work, including when it will be completed, and details of any assessments you have made of the impact it will have on increasing planting rates?

The Committee recommended that there should be a presumption of approval for applications in areas identified by the Map as having a high suitability for woodland. Please provide the Committee with details of any assessment you have made of the potential benefits or risks arising from this approach.

Recommendation 3: The Welsh Government must specify how it will use trees and woodlands as a nature-based solution to flooding, and facilitate expansion of the Woodland Carbon Code.

Welsh Government response: *Accept in Principle*

Please provide further detail of the actions you are taking, or are intending to take, to expand use of the Woodland Carbon Code and addressing barriers to uptake.



In your response, you say that you will consider whether registration with the Code should be a requirement in certain circumstances. The Committee would be grateful for an update on your latest thinking on this issue.

Recommendation 4: The Welsh Government must commit to ensuring a minimum of 20% urban tree canopy cover, to be addressed through Local Well-being Plans and Area Statements.

Welsh Government response: Decline

The Committee is disappointed that this recommendation has been rejected. Setting an *overall* target for urban canopy cover in Wales would not impinge on local decision making and would serve as a useful tool to drive forward work in this area. This approach would be consistent with that taken by Welsh Government in many policy areas. Indeed, you have introduced an overall target for woodland creation in Wales. In response to this letter, can you consider whether you would be prepared to introduce such an overall target for urban canopy cover?

You go on to state that you consider that some form of location-specific indicator of achievement should be available to those drawing up Local Well-being Plans. Please provide an estimate of when this work will be completed and further information on how the indicator is being developed.

Recommendation 5: Woodlands can be an effective tool for regeneration and engaging local communities. The Welsh Government must harness this and, as a starting point, should:

- Increase support to community woodland groups.
- Assess the potential of developing a National Forest Company to help regenerate the south Wales valleys.
- Ensure that woodland education is incorporated into education policies.

Welsh Government response: Accept in Principle

In relation to funding for community groups, your response says that the priorities for future funding will align more closely with the priorities of the Natural Resources Policy. Can you provide the Committee with an assessment you have made of the impact this may have on support for community woodland groups?

Please provide the Committee with an update on the work to explore the development of a Valleys Landscape Park.



Recommendation 6: The Welsh Government must extend and better manage access to public woodlands, especially for marginalised groups. NRW should examine options for recovering costs from user groups for certain recreational activities in the woodlands it manages.

Welsh Government response: *Accept in Principle*

In your response, you say that you have reservations about charging for recreational activities because of the potential barrier, especially for marginalised groups.

The Committee was careful in its use of language and did not recommend charging for use. Recovering costs, perhaps through licensing, from user groups engaging in specified activities in certain areas, such as noisy or high-speed activities, would reduce illegal use of woodlands elsewhere. Please provide the Committee with any assessment you have made of the potential impact of this approach and the evidence that supports your decision not to pursue this proposal.

Recommendation 7: The Welsh Government should clarify its timetable for bringing forward proposals on access reform.

Welsh Government response: *Accept in Principle*

The Committee accepts that it may not be possible at this stage to give a detailed timetable for the next steps, but we would welcome an indication from you of the broad milestones for this work.

Given that the Sustainable Management of Natural Resources consultation closed on 30 September, we would be grateful if you could provide an oral update on the details of the next steps during the debate on the Committee report.

Recommendation 8: The Welsh Government must address the constraints on the commercial forestry sector, in particular by:

- Facilitating coniferous woodland creation and commercial operations on both public and private land.
- Promoting to the farming community the commercial and other benefits of planting trees on agricultural land, and enabling farmers to do this through additional, simple and flexible grant payments.
- Providing and promoting training in forestry, woodland management and woodland planning.

Welsh Government response: *Accept*



Could you provide details of any assessment you have made of the impact of the work of the Co-operative Forest Planning scheme?

In your response, you say that “forest industries must also do more to work collaboratively with landowners, NRW and regulators to make the investments on which their industry relies. The scale of investment required to meet future needs is significant and public and private sectors will need to work together to make it happen.” Can you provide details of any actions you are taking to advance this issue?

Can you provide details of any specific work that has been undertaken by the Welsh Government to promote to the farming community the commercial and other benefits of planting trees on agricultural land?

Training and the promotion of training was a key issue for stakeholders who contributed to the inquiry. Are you satisfied that the actions you outlined in your response are sufficient to address those concerns?

Recommendation 9: The potential for growth in the commercial forestry sector should be actively supported by Welsh Government. In particular it should:

- Agree with the forestry sector ambitious targets for Wales to become increasingly self-sufficient in timber production and less reliant on imports.
- Consider changing the building regulations to promote the use of timber in construction.

Welsh Government response: Accept in Principle

Your response says that you are working with the construction industry to increase the use of timber in construction. You say that “early evidence” indicates that changing custom and practice and procurement practices offer greater scope to see progress, compared to changing building regulations or planning guidance. The Committee would be grateful if you could share this evidence with us.

Could you also provide the Committee with any assessment you have made of the potential impact of your preferred approach and set out the actions you will take to encourage the changes in custom and practice and procurement practices to which you refer?

Recommendation 10: The Welsh Government should reintroduce the Glastir Woodland Management Scheme and ensure that planting meets the UK Woodland Assurance Standard.

Welsh Government response: Accept in Principle



Could you provide the Committee with an update on your progress in exploring opportunities to re-prioritise resources to allow for the limited opening of the Glastir Woodland Management Scheme?

Recommendation 11: The Welsh Government must work with stakeholders to ensure its tree health strategy demonstrates the lessons learnt from the outbreaks of Ash Dieback and Larch Disease.

Welsh Government response: Accept

Can you provide the Committee with an estimate of when the review of the functions and membership of the Tree and Plant Health Steering Group will be completed? The Committee would be grateful if you could inform us of the outcomes of that review once it is complete.

Recommendation 12: The Welsh Government must improve delivery of the Woodlands for Wales strategy, in particular by:

- Addressing the barriers to woodland creation as a matter of urgency.
- Revising the strategy by early 2018, and specifying how it will support and be supported by the Well-being of Future Generations (Wales) Act 2015, the Environment (Wales) Act 2016, and the Natural Resources Policy.
- Improving the transparency and power of Woodland Strategy Advisory Panel to drive the strategy forwards.

Welsh Government response: Accept in Principle

Your response does not address the final part of the Committee's recommendation. Given that your response states that the advisory panel's role is to support the Welsh Ministers' development of forestry policy, do you have any plans to address the concerns raised by stakeholders during the inquiry about a lack of transparency and clarity about the panel's role and work?

Recommendation 13: As recommended in the Committee's report on the future of land management in Wales, the Welsh Government must ensure that future funding should be based on sustainable outcomes. This approach could be supported by innovative methods such as Payments for Ecosystem Services and pension fund investment in green infrastructure.

Welsh Government response: Accept

The Committee would be grateful if you could share the final report of the Glastir Monitoring and Evaluation Programme as soon as it is available.



The Committee has asked the Business Committee to schedule a Plenary debate on the Committee's report on 13 December. I would be grateful if you could respond to this letter by 27 November, so that your response can inform the Plenary debate.

Yours sincerely,

A handwritten signature in black ink that reads "Mike Hedges". The signature is written in a cursive style with a large initial 'M'.

Mike Hedges AM

Chair of Climate Change, Rural Affairs and Environment Committee



Written Response by the Welsh Government to the Report of the Climate Change, Environment and Rural Affairs Report entitled '*Branching Out: A New Ambition for Woodland Policies*'.

I welcome the Committee's report and the opportunity to discuss and develop the working arrangement proposals for the Welsh Government's response to it. Through their engagement with stakeholders, the Committee has produced a constructive report and many of the Committee's recommendations align with our thinking.

The Welsh Government woodland estate makes up a substantial share of woodland in Wales and as such is a significant asset to deliver a range of benefits for society. Representing around 7% of the land area of Wales, the woodland estate enables delivery of these multiple benefits. It is a tool for delivering our Natural Resources Policy priorities, including through testing new ways of managing woodlands in the context of threats to tree health and a changing climate.

The economic value of the wider benefits which trees and woodlands provide (such as improved air quality, their contribution towards health and well-being and, together with other measures, their role in helping to reduce the risk of flooding) are becoming better understood. Optimising timber production, alongside maintaining a forest resource for environmental and for social benefit, is at the heart of *Woodlands for Wales*, the Welsh Government's strategy for woodlands and trees in Wales.

The woodland estate is, therefore, a means for the Welsh Government and Natural Resources Wales (NRW) to demonstrate how sustainable management of natural resources can deliver benefits for today and, importantly, for future generations. The woodland estate is also an important social asset and contributes to a sense of identity at a local level.

As we move towards the UK's withdrawal from the European Union, there are opportunities to build on Wales' reputation for high quality goods and services, underpinned by resilient natural resources across both local and international markets. The Welsh Government would like to encourage a strong focus on improving processing and added value within supply chains across Wales to support our competitiveness. The resilience of our natural resources and the opportunities they provide have become even more important to Wales as we define a new place in the world.

I have set out my response to the report's individual recommendations below.

Recommendation 1

The Committee recommends that:

The Welsh Government must, as a matter of urgency, refresh its woodland strategy with the aim of significantly increasing planting rates. The refreshed strategy must include long term targets for woodland cover and must incorporate commercial forestry.

Response:

Accept in Principle

The Welsh Government's 50 year strategy for woodlands and trees, *Woodlands for Wales*, was published in 2001 and revised in 2009. The Welsh Government agrees it is time for the strategy to be refreshed to better align it with the new approaches put in place by the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 for the sustainable management and use of Wales' natural resources including its forests, woodlands and trees, for the present and future generations.

The strategy sets out the Government's long-term vision and outcomes for Wales' woodlands and trees. The strategy's accompanying 5-year action plan (to March 2020) sets a target of 2,000 hectares of new planting per annum. An update of the action plan has previously been submitted to the Committee.

A full public consultation will be required as part of the strategy's refresh. Therefore, the Welsh Government will develop consultation proposals by the early part of 2018 and look to conclude the refresh later in the year.

Increasing woodland cover and developing a competitive and integrated forest sector are, and will remain, key outcomes of the strategy, the delivery of which will be guided by the Natural Resources Policy and its area-based implementation. In addition, the Welsh Government's Decarbonisation Programme and the setting of the first carbon budgets under the 2016 Act, provides a significant opportunity for future woodland creation. The existing strategy already makes provision for the forestry sector and commercial woodlands (Chapter 5) however, this will be reviewed during its refresh.

Financial Implications:

Refreshing the strategy will not in itself result in a financial cost. Of course, any revised policies – particularly any that relate to significantly increasing planting rates – may carry additional costs and an evidence base needs to be developed in order to support future policy options. The financial implications of this proposal are not known at this time and will be assessed when the refresh proposals are being planned.

Recommendation 2

The Committee recommends that:

The Welsh Government must address the barriers to increasing planting, in particular by:

- Aligning the regulatory and funding processes, and providing additional guidance and support to applicants.
- Examining the potential for adopting a presumption of approval for applications in areas identified by the Woodland Opportunities Map as having a high suitability for woodland.
- Making the Woodland Opportunities Map more user-friendly to a range of different user groups, and linking it in with the land use planning system.

Response:

Accept in Principle

The Welsh Government is working to address barriers to increasing woodland planting in line with delivery of the key outcomes set out in its strategy. The Government is working closely with NRW to improve alignment of regulatory processes, in particular, the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999 (as amended) with the Glastir Woodland Creation application process to facilitate the successful progression of woodland creation proposals.

The Welsh Government will work with NRW and partners to improve the application process. We will explore ways to allow for longer application periods and advance notice of Expression of Interest windows under Glastir or any future replacement scheme.

The Welsh Government is committed to continuous improvement of the Woodland Opportunities Map. Our aim will be to ensure more useful information is provided to applicants to enable them to proceed with more certainty about whether a proposal is likely to be approved. However, the map cannot be a substitute for detailed planning of individual applications to ensure they meet the required standard for sustainable management, including an evaluation of the species and the habitats which may be impacted, by planning woodland creation accordingly.

As we take forward the process of identifying important habitats and species under sections 6 and 7 of the Environment Wales (Wales) Act 2016, the Welsh Government will ensure guidance on these is consistent with sustainable management of natural resources, which gives priority to ensuring habitat and ecosystem resilience in the future, consistent with the principles of sustainability set out in the Well-being of Future Generations (Wales) Act 2015.

The development of Area Statements and taking forward the local delivery of the Natural Resources Policy will provide an opportunity to embed the

Woodland Opportunities Map in local delivery and decision making by landowners and regulators alike. The Welsh Government expects statements will give a clear indication locally about where new woodland should be created.

Area Statements will have a strong link to local planning and, as required by the Well-being of Future Generations (Wales) Act 2015, we expect Local Service Boards to take account of the opportunities to create new woodland as they contribute to the development of land-use planning in their respective areas.

Financial Implications:

Whilst the Welsh Government owns the Woodland Opportunities Map, NRW hosts it on the 'Lle' web portal. The cost of hosting the map is met within the departmental budget. There may be an opportunity to consider transferring responsibility for the map to NRW linked to their delivery of Area Statements so management and the evidence and information to support it are kept in one place which can be looked into.

NRW currently meets the cost of undertaking environmental impact assessments for forestry. A review of environmental impact assessment and strategic environmental assessment legislation is underway by officials in the context of EU exit and any changes to legislation would need to be considered in light of wider policy and administrative needs for these regimes as a whole.

Recommendation 3

The Committee recommends that:

The Welsh Government must specify how it will use trees and woodlands as a nature-based solution to flooding, and facilitate expansion of the Woodland Carbon Code.

Response:

Accept in Principle

The Welsh Government considers this recommendation is in line with our aspirations and policies for a catchment-based approach to natural flood risk management. We have accepted this in principle because the National Strategy for Flood and Coastal Erosion Risk Management is being updated and we will seek to ensure this that sets out the place of tree planting and woodland management in a catchment based approach.

Whilst natural flood risk management should be considered when appraising a flood scheme, it may not always be the best solution or may work better in combination with other alleviation methods, such as peatbog restoration, pond creation or establishment of grassland buffers. Tree planting would rarely be used alone in a flood intervention as it does not provide the certainty hydrologists and engineers seek to ensure a 'set' reduction in risk. Whilst we

are still learning how and where trees are best used for flood risk management, we agree with the report's conclusions regarding planting the upper catchments are likely to bring benefit to reduce flood risk. We want to see natural flood risk management considered as an option for reducing flood risk and, as such, natural flood management approaches are eligible under the Welsh Government funded flood risk management programme. Flood risk benefits are likely to be seen through non-flood risk specific initiatives, such as forestry planting.

The Woodland Carbon Code is a voluntary regime and uptake ultimately depends on decisions by project developers to use it. A key requirement of participation in the code is the tree planting schemes which register with it must be voluntary actions rather than be something the landowner is required to do. This is because of the principle of 'additionality', payment for ecosystem services must be instrumental in deciding whether the project goes ahead. If there is a legal requirement to restock trees (such as restocking conditions in a conditional felling licence), the test would not be met because the planting in these circumstances would not provide any additionality or additional gain, no new woodland is being created.

While we maintain this voluntary principle, the Welsh Government fully supports the Woodland Carbon Code and will work to expand its use and address the barriers to the uptake of the Code. Where applicants apply for grant for new woodland planting, we will consider whether we should make it a requirement that they must register with the Code. Currently, registration with the Code, the first step to generating and selling carbon credits, is required only for the 'Native Woodland - Carbon' option within Glastir Woodland Creation. As all woodland creation ultimately serves the purpose of carbon sequestration, it may be appropriate to extend this provision to all woodland planting in Glastir and any future replacement scheme. Registration with the Code does require extra effort by the landowner and, for very small woodland areas, this may be disproportionate, so we will give consideration to whether a group registration scheme can be established as part of any replacement woodland creation scheme application process.

Financial Implications:

These are not known at this time.

Recommendation 4

The Committee recommends that:

The Welsh Government must commit to ensuring a minimum of 20% urban tree canopy cover, to be addressed through Local Well-being Plans and Area Statements.

**Response:
Decline**

A single target is unlikely to be helpful in taking forward our policies or achieving the goals the Committee wants to deliver. Each urban area in Wales is different. The average canopy cover for Wales, by Local Authority area is 16.3%, with the highest cover in Torfaen (23.2%) and the lowest in Denbighshire (11.7%). The process of drawing up Local Well-being Plans and Area Statements, involving Local Service Boards in decision making, is the mechanism set out in the Well-being of Future Generations and Environment Wales Acts as the delivery mechanism for targets to meet local needs and priorities. Setting an additional goal, as recommended by the committee, would prejudge the local decision making process envisaged by this legislation.

The Welsh Government does consider some form of location-specific indicator of achievement should be available to those drawing up Local Well-being Plans. Accordingly, we support NRW's work to measure canopy cover and will explore ways to monitor changes in canopy cover from the baseline established in the canopy cover report, '*Tree Cover in Wales' Towns and Cities*'. This evidence will inform Local Service Boards and assist them in setting local targets.

The Welsh Government will work with NRW and Local Authorities to expand use of the iTree Eco tool for monitoring urban trees and woodlands in and around towns through '*Taking Forward Wales' Sustainable Management of Natural Resources*' the Welsh Government is consulting on measures to enhance protection of ancient, heritage and valued trees. We also look forward to receiving advice from the Law Commission on this subject.

Financial Implications:

A repeat of the canopy cover report, '*Tree Cover in Wales' Towns and Cities*' by NRW would cost in the region of £30,000.

There would be no direct financial implications from rejecting this recommendation.

**Recommendation 5
The Committee recommends that:**

Woodlands can be an effective tool for regeneration and engaging local communities. The Welsh Government must harness this and, as a starting point, should:

- Increase support to community woodland groups.
- Assess the potential of developing a National Forest Company to help regenerate the south Wales valleys.
- Ensure that woodland education is incorporated into education policies.

Response:
Accept in Principle

Current funding for community groups is provided via the Welsh Government core grant. Following an open and competitive application process, funding of nearly £22 million was awarded to 16 organisations (out of 61 applicants) over a 2.5 year period (1 October 2015 - 31 March 2018). A number of the successful organisations have an interest in forestry/woodland related activity. For example, Llais y Goedwig were successful in securing just under £340,000 to deliver mentoring and support for the start-up of community woodland groups and to develop capability and to build capacity. Similarly, Coed Cymru received funding of £449,000 over the same period to build capacity, to assist in the delivery of a range of objectives in the Welsh Government's strategy for trees and woodlands and to support the important role that woodlands can play in implementing integrated natural resource management.

The current funding arrangement comes to an end in 2018 and the Welsh Government is considering the steps it should take to provide such funding in future. The Welsh Government cannot prejudge future decisions to offer grant funding to specific organisations. Core funding grants will be considered for organisations sharing similar goals and priorities to our own, who are seeking to deliver the same outcomes and who have proposals for work in the priority areas. We will be working with current core and wider third sector organisations over the coming months to co-design the next round of core funding. However, it is likely the priorities for funding will align more closely with the priorities of the Natural Resources Policy.

There is potential to take forward measures to enhance the use of trees, woodlands and forests as part of Valleys regeneration projects. A significant area of forest in the south Wales Valleys is already in public ownership and is managed by NRW with a strong focus on delivery for local communities. In areas where communities have said they want to have direct involvement in woodland management, NRW has put in place measures to provide opportunities to engage, including the Mynediad scheme. These public forests also support economic development locally, by providing a reliable supply of forest products to sawmill and bioenergy plants. To ensure fairness to all, these products are offered to market in a fair, open and transparent way and other opportunities to use the forests need to be offered in a similar fashion.

As NRW develops Area Statements, the Welsh Government expects they will seek to align their forest resource planning process with these. This should enable local communities to identify opportunities where local economic development can be enhanced, while respecting the need for fairness, openness and transparency.

The Welsh Government is consulting about whether there is a need to remove legislative barriers which might prevent communities from being given greater control over their local woodlands. The *Taking Forward Wales' Sustainable Management of Natural Resources* consultation will run to 30 September and

we will consider the responses to the consultation and the need for further legislation in light of those.

The Welsh Government created *Plant! A Tree for Every Child* in 2008 and this is managed by NRW and Coed Cadw (The Woodland Trust in Wales). There are now sites right across Wales which have been planted with nearly 300,000 native broadleaf trees for every child born and adopted in Wales.

On 20th July, the Ministerial Taskforce for the Valleys published its plan, *Our Valleys Our Future*. The plan includes a commitment to explore the development of a Valleys Landscape Park. This will help communities to work with the public sector to maximise benefits from the area's natural resources. This may include community development of woodland, developing employment and training opportunities through green infrastructure and the use of locally sourced timber in the creation of 21st century homes.

The Welsh Government recognises the unique value of outdoor learning and the many benefits it brings for children including supporting the development of healthy and active lifestyles; developing problem solving skills; and understanding and respecting nature and the environment in which they live. The National Curriculum, through a variety of subjects, already gives learners the opportunity to gain knowledge of the natural world in various outdoor settings – such as through geography or science fieldwork or visits to historic or religious sites. It therefore recognises the value to children developing their skills, knowledge and understanding through being involved in a range of experiences including activities in the indoor and outdoor learning environments.

Financial Implications:

Funding for Llais y Goedwig is currently £339,020 and for Coed Cymru it is £449,000 over a 2.5-year period. We will engage those organisations/groups in the co-production to shape and form any future funding streams so they are better informed and able to apply for any future funding rounds.

All other costs are met from programme budgets.

NRW is likely to identify that greater working with communities would entail increased cost and staff resources.

Recommendation 6

The Committee recommends that:

The Welsh Government must extend and better manage access to public woodlands, especially for marginalised groups. NRW should examine options for recovering costs from user groups for certain recreational activities in the woodlands it manages.

**Response:
Accept in Principle**

The Welsh Government agrees with the sentiment of the recommendation, however, it has reservations over the appropriateness of implementing certain charging regimes on its estate.

NRW has operational responsibility for the Welsh Government's woodland estate, including an important responsibility to balance the priorities for providing access to different groups. These responsibilities are subject to the Welsh Ministers' overarching strategic policy over the use and promotion of access and outdoor recreation across Wales.

The Welsh Government is committed to developing a simpler, less onerous framework for access, which facilitates consistency in the opportunities available for participation in different activities and appropriately communicates to all interests their responsibilities and duties.

The Welsh Government is currently consulting on a number of proposals which seek to deliver its commitment to manage Wales' natural resources more sustainably to deliver lasting economic, social and cultural, as well as environmental benefits, to ensure the continued prosperity of Wales. These include proposals to increase the opportunities for outdoor recreation for a wider range of activities on access land and the public rights of way network near to where people live. A key aim is to ensure that people can access green and blue space for responsible recreation regardless of their means and abilities.

Woodlands are highly valued for the health, well-being, social and economic benefits they provide in relation to outdoor recreation. They are often hubs for shared-use paths and multi-user activity, which is free at the point of use. The Welsh Government is keen to see this continue and extended to other areas.

The Welsh Government has reservations about charging for recreational activities because of the potential barrier, especially for marginalised groups. Provision of amenities or services enhance the access experience and are particularly valued by those who traditionally make less use of the countryside for recreation, including those with mobility issues, people from deprived communities and families with young children.

Financial Implications:

The financial and legal requirements for improving, maintaining and promoting public access to the Welsh Government woodland estate will be met from NRW's budget.

Recommendation 7

The Committee recommends that:

The Welsh Government should clarify its timetable for bringing forward proposals on access reform.

Response:

Accept in Principle

The Welsh Government's current consultation, '*Taking Forward Wales' Sustainable Management of Natural Resources*' contains proposals for updating the legislative framework for public access to the outdoors. The consultation is due to close on 30 September. The extent and nature of the responses received will determine the next steps.

Financial Implications:

No direct financial implications – administrative costs of stakeholder engagement are met from programme budgets.

Recommendation 8

The Committee recommends that:

The Welsh Government must address the constraints on the commercial forestry sector, in particular by:

- Facilitating coniferous woodland creation and commercial operations on both public and private land.
- Promoting to the farming community the commercial and other benefits of planting trees on agricultural land, and enabling farmers to do this through additional, simple and flexible grant payments.
- Providing and promoting training in forestry, woodland management and woodland planning.

Response:

Accept

The Welsh Government recognises the need to enable greater planting of productive woodland in order to enable Wales to meet the needs of future generations. Creation of woodland at scale requires co-operation, collaboration and involvement of a range of interested parties and to facilitate this, the Welsh Government has established a Co-operative Forest Planning Scheme under the Welsh Government RCRDP (2014-2020).

The Welsh Government is committed to playing its part in woodland creation, working with forest industries, although, in accepting this recommendation, notes forest industries must also do more to work collaboratively with landowners, NRW and regulators to make the investments on which their industry relies. The scale of investment required to meet future needs is

significant and public and private sectors will need to work together to make it happen.

The Welsh Government is committed to working collaboratively with the farming community and with NRW to ensure farmers are aware of the opportunities from creating and managing woodland areas on their land. The Welsh Government recognises farmers have a choice about how they manage their land and for many, the changed circumstances brought about by EU exit will be a significant challenge.

The opportunity to use woodlands for shelter, for timber production and to enhance their holding while generating future income may be significant for some farmers with the skills and the desire to grasp it. Investment in woodland is a very long-term activity and, unless the farm already has significant mature woodland areas, it may not produce a regular return in the way livestock can.

Through the Land Use Sub Group, the Welsh Government is working with a range of stakeholders, including farming unions, environmental bodies and commercial forestry representatives. The Group is working to ensure that all land use, including small and large scale afforestation, is considered as part of the bigger picture of land use going forward. The practical difficulties of all aspects of diversification into tree planting, including consenting procedures and training, are being considered and issues collated to improve scheme delivery in future.

Through '*Taking Forward Wales' Sustainable Management of Natural Resources*' we are consulting on the future regulation of felling to make the system more flexible provided this does not result in a net reduction of woodland area in Wales.

The Welsh Government provides and funds training in forestry, woodland management and woodland planning through Farming Connect and the Welsh Government RCRDP, which also provided support for 'Focus on Forestry First'. There are a wide range of forestry education and training providers operating in Wales, such as NRW (through their national scheme 'Cyfle' which provides support and management of work experience placements, volunteers, under- and post-graduate placements and apprenticeships), LANTRA, who provide a range of certified forestry courses and also those provided by Wrexham Glyndwr and Bangor Universities, as well as the industry's professional body, the Institute of Chartered Foresters.

Financial Implications:

The budget for Round 1 of the Co-operative Forest Planning Scheme (Welsh Government RCRDP (2014-2020)) is £180,000.

Round 2 will be run in Autumn 2017 and the budget is in the region of £300,000. There is no commitment to continue funding this Scheme after 2 rounds.

The current Expression of Interest round of funding for Glastir Woodland Creation (Welsh Government RCRDP (2014-2020)) closes on 25 August with a total budget of £1.7 million.

A further round of Glastir Woodland Creation will be run from 26 February – 6 April 2018 and this will have a budget of £1.7 million.

Continuation of support for woodlands and forestry is dependent on a decision in respect of the replacement for both Pillars of the CAP.

Recommendation 9

The Committee recommends that:

The potential for growth in the commercial forestry sector should be actively supported by Welsh Government. In particular it should:

- Agree with the forestry sector ambitious targets for Wales to become increasingly self-sufficient in timber production and less reliant on imports.
- Consider changing the building regulations to promote the use of timber in construction.

Response:

Accept in Principle

The Welsh Government is already working with the construction sector to encourage and increase the use of timber in construction. The ambition to be self-sufficient is not readily achievable or particularly desirable for several reasons. Firstly, Wales produces significant excesses of timber and wood products which it does not use domestically. The location of forests in relation to demand in Wales means it is often more sensible to meet demand in Wales by using timber from England and vice versa because of the long land border and the location of processing facilities along the border. It is more important to focus on:

- Local supply chains, where timber transport can be optimised so costs and CO2 emissions can be minimised.
- Use of timber first, irrespective of its origin, in housing and other construction to establish supply chains and market drivers for sustainable materials.
- Use of timber in the context of a circular economy, where we focus on design for its recovery, re-use and recycling when the first use product is decommissioned.

The Welsh Government is working with the construction industry to examine the extent to which current building regulations or planning guidance may be a barrier to greater use of timber. Early evidence suggests that changing established custom and practice within the construction industry and procurement practice offers greater scope to see progress in this regard.

The Welsh Government's new Innovative Housing Programme will make available £20 million over 2017-18 and 2018-19. It is part of our 20,000 affordable homes target and has been designed to align with the requirements of the Future Generations (Wales) Act 2015. Schemes using timber, particularly Welsh timber, will be welcome. Whilst this initiative is not intended to promote any specific type of construction, it is entirely possible that 'non-traditional' approaches to the design and delivery of new housing could include solutions which make greater use of timber. Schemes that have submitted an application for financial support will be assessed against a rigorous framework of criteria designed to deliver sustainable development and homes which remain fit for purpose throughout their intended life.

Financial Implications:

No direct financial implications – administrative costs of managing stakeholder involvement only are met from programme budgets.

Recommendation 10

The Committee recommends that:

The Welsh Government should reintroduce the Glastir Woodland Management Scheme and ensure that planting meets the UK Woodland Assurance Standard.

Response:

Accept in Principle

The available funds for the Welsh Government RCRDP (2014-2020) are currently fully committed, including an allocation for future windows for the Timber Business Investment Scheme. The Welsh Government supported woodland management under the previous RDP through Glastir Woodland Management (GWM) and this included re-stocking grants to diversify woodlands. However, when the scheme was launched support was focussed on the restoration of Plantations on Ancient Woodland Sites (PAWS), bringing unmanaged woodland into active management and encouraging a move away from clear-felling to low impact silvicultural systems.

The outbreak of *Phytophthora ramorum* (*P ramorum*) necessarily caused GWM to prioritise re-stocking options to mitigate the risk of land-use change, where a Statutory Plant Health Notice had been issued, and to help woodland managers to mitigate the risk of their larch being infected and the risk of further spread of the disease. This meant the vast majority of the GWM budget went to re-stock. Under this Rural Development Programme, given the pressure on financial resources and in agreement with the industry, tackling *P ramorum* and new woodland creation were given priority. However, the Welsh Government will explore opportunities to re-prioritise resources to allow for limited opening of the Glastir Woodland Management Scheme.

The UK Forestry Standard (UKFS) sets out what is required for woodlands to be sustainably managed. However it does not, by itself, provide the means for the woodland owner or manager to demonstrate to their customers they are complying with the standard. To fill this gap, the UK Woodland Assurance Standard (UKWAS) provides a “compliance standard”, setting out a set of requirements and stating what practical evidence of activities and management practice is needed in order compliance can be independently audited and a certificate awarded by certification bodies like Forest Stewardship Council (FSC) or Programme for Endorsement of Forest Certification (PEFC).

While compliance with UKWAS is desirable and is encouraged, having FSC or PEFC certification for timber or other forest products like venison, can help the owner gain market access, can provide higher prices for timber sold and is evidence of sustainability in biomass markets. However, UKWAS is a third party certification scheme and participation in it involves a cost to the woodland owner. In woodlands of less than 10 hectares, which accounts for around a third of Welsh woodland, it is often not cost effective in terms of the return to the owner from greater market access or higher prices.

Making compliance with UKWAS a condition of Glastir Woodland Management or planting schemes is likely to undermine its uptake by smaller woodland owners. The UKFS, on which the UKWAS certification scheme is based, provides a standard against which woodland planting and woodland management schemes can be verified. Our aim is to ensure woodland owners who prepare a forest management plan to demonstrate compliance with UKFS can use the plan as part of the requirements they will face if they choose voluntarily to participate in the UKWAS to gain third party certification.

The Land Use Sub Group is working to ensure all land use, including the management of existing woodlands, restoration of PAWS, strategic eradication of invasive non-native species and stock exclusion (if appropriate), is considered, along with all other land use.

Financial Implications:

The Welsh Government RCRDP (2014-2020) funds are fully committed through to the end of the Programme in 2023. Funds can only be made available for re-introduction of a Management Scheme by withdrawing them from other parts of the Programme. A further £4 million is currently scheduled for future rounds of the Timber Business Investment Scheme.

Glastir Woodland Management has not opened under the Programme yet in part because the industry had agreed with the Welsh Government an order of priorities that has focussed on woodland creation and restoration. It also represents least value for money because the receipts from timber sales have been boosted in the order of 20% by exchange rate shifts since the EU referendum. This represents a windfall estimated as being in the order of £100million over the Programme period.

Officials are considering the case for reintroducing the Glastir Woodland Management Scheme in light of EU exit.

Recommendation 11

The Committee recommends that:

The Welsh Government must work with stakeholders to ensure its tree health strategy demonstrates the lessons learnt from the outbreaks of Ash Dieback and Larch Disease.

Response:

Accept

The Wales Tree and Plant Health Steering Group (which includes a range of stakeholder representatives) regularly meets to review updates in respect of the tree health strategies for Wales. Operational Response Teams for both *P ramorum* and *Chalara* meet to review the latest information on *P ramorum* infection and *Chalara* outbreaks and they feed this information back to the Steering Group.

The Welsh Government intends to review the functions of the Tree and Plant Health Steering Group and its membership to ensure it remains fit for purpose as we face increased challenge from tree diseases. The refresh of the *Woodlands for Wales* strategy will also consider our response to disease outbreak in light of the evidence from science and the continued impact of climate change and of the decision to leave the EU.

The Welsh Government will consider whether changes to legislation are needed in response to developing disease threats and work closely with DEFRA and the Scottish Government to combine our efforts to combat disease.

Financial Implications:

The full financial implications will be assessed as part of the review.

Recommendation 12

The Committee recommends that:

The Welsh Government must improve delivery of the Woodlands for Wales strategy, in particular by:

- Addressing the barriers to woodland creation as a matter of urgency.
- Revising the strategy by early 2018 and specifying how it will support and be supported by the Well-being of Future Generations (Wales) Act 2015, the Environment (Wales) Act 2016, and the Natural Resources Policy.
- Improving the transparency and power of Woodland Strategy Advisory Panel to drive the strategy forwards.

Response:
Accept in Principle

The Welsh Government has accepted, in principle, the recommendation (Recommendation 1) to review barriers to woodland creation. The strategy will be refreshed in line with the Natural Resources Policy, with emerging Decarbonisation Strategies and with the development of Area Statements by NRW. However, the timeline for publication of these strategies, together with the need for public consultation around a refreshed strategy is likely to take this work well into 2018. We will bring forward consultation proposals by the early part of 2018 and look to conclude a revised strategy later in that year.

The Woodland Strategy Advisory Panel performs an important set of functions on behalf of Welsh Ministers. As well as acting as an advisory panel to support the Welsh Ministers' development of forestry policy, it also supports the Welsh Ministers to handle the determination of felling licence appeals under forestry legislation.

Financial Implications:

The review of the strategy will require time and resource to complete, the details of which are not as yet known. The financial implications will be assessed as part of the review.

Recommendation 13
The Committee recommends that:

As recommended in the Committee's report on the future of land management in Wales, the Welsh Government must ensure that future funding should be based on sustainable outcomes. This approach could be supported by innovative methods such as payments for ecosystem services and pension fund investment in green infrastructure.

Response:
Accept

As noted above, the Welsh Government agrees that mechanisms such as payments for ecosystem services have a role to play in future funding models. The Woodland Carbon Code (Recommendation 3) has a key role as an exemplar which is paving the way for this kind of mechanism. It also helps us to identify potential barriers, such as the low market price of carbon and the need to find means to address them.

The Welsh Government is working to ensure woodland management and planting is integrated with all other land use to meet environmental, economic and well-being goals.

The final report from the Glastir Monitoring and Evaluation Programme (GMEP) will be used to determine which land use measures have been most successful. This evidence will be used to help to inform the design of support mechanisms going forward.

Financial Implications:

These are not known at this time.

Lesley Griffiths, AM
Cabinet Secretary for Environment and Rural Affairs

Lesley Griffiths AC/AM
Ysgrifennydd y Cabinet dros yr Amgylchedd a Materion Gwledig
Cabinet Secretary for Environment and Rural Affairs



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref: MA-P/LG/3233/17
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18

October 2017

Dear Mike

When I attended the Committee on the 20 July, I agreed I would write to you regarding the paper from the UK Assessment Panel of the IUCN World Commission on Protected Areas on the *Future Landscapes: Delivering for Wales* report, referred to by Simon Thomas AM.

The IUCN in the UK has confirmed the status of this paper as a considered opinion from members of the UK Assessment Panel, to act as an advisory note or a briefing paper as required.

The paper concludes if the recommendations of the Future Landscapes report are acted upon "it would make it impossible for the Panel to continue to accord international recognition to Wales' National Parks and Areas of Outstanding Natural Beauty as 'protected areas'". The paper focuses almost exclusively on the absence of a reference to the Sandford Principle, or other primacy of nature conservation principle, to support this conclusion. Their interpretation of the Future Landscapes Wales proposition is that, without an explicit nature conservation safeguard, it would lead to a reduction in the protection given to nature by National Park or Area of Outstanding Natural Beauty (AONB) designation. As a result the designation would fail to meet the IUCN protected area definition.

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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.

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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.

I can categorically confirm I will not bring forward any proposals for reform which would put the natural beauty and special qualities of AONBs and National Parks at risk. This is the position from which I will consider the responses to the consultation on '*Taking Forward Wales' Sustainable Management of Natural Resources*' and decide on my priorities for these areas. I have regularly made such a commitment but want to confirm again.

I will make a full statement on the way forward with designated landscapes once I have reviewed all the responses to the current consultation, which include aspects of the Future Landscapes proposition. The IUCN UK have been encouraged to respond.

However, I want to emphasise it is important to appreciate the current legislative context for designated landscapes in Wales. The analysis of Future Landscapes by the Panel appears limited to comparing its proposition to their appraisal of National Parks and AONBs for the *Putting Nature on the Map* report in 2014. There is no reference to the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016, both of which mean the National Parks and AONBs in Wales now operate in a very different context. This context puts well-being and the sustainable management of natural resources central to what they do and the Future Landscapes proposition cannot be properly understood when divorced from these drivers.

The rationale for the establishment of National Parks and AONBs in England and Wales, and the associated statutory purposes, are not derived from the IUCN's focus on nature conservation and associated definition of protected areas. Instead, the designations stemmed from the wish to safeguard the natural beauty of these areas and, in the case of National Parks, the opportunity to promote their enjoyment. This includes, but is not limited to, their value for nature conservation. Therefore, it is inevitable when applying criteria which have a specific emphasis, there will need to be a judgement on the interpretation and weight to be applied to the purpose and effectiveness of the designation under scrutiny. Any suggestions or proposals to explore changes to purposes will also be affected in this way.

So, whilst I welcome the current recognition by IUCN, I also believe it should be a consideration and not a driver for how Wales decides it should best protect its landscapes.

Future Landscapes has provided the opportunity for all partners to reaffirm the importance of the Welsh landscapes, where safeguarding the special qualities of landscape should be paramount in decision making. I acknowledge the case for clarifying the Welsh Government's position on these issues. I intend to address this when I make a statement responding to the consultation.



Lesley Griffiths AC/AM
Ysgrifennydd y Cabinet dros yr Amgylchedd a Materion Gwledig
Cabinet Secretary for Environment and Rural Affairs

Lesley Griffiths AM,
Cabinet Secretary for Environment and Rural Affairs,
Welsh Government

3 October 2017

Dear Lesley

Turning the Tide: the Climate Change, Environment and Rural Affairs Committee's report on the Welsh Government's approach to Marine Protected Area (MPA) management

Thank you for your response to the Committee's report, which is attached as an Annexe to this letter. The Committee has agreed that I should write to you to seek further information on several matters you raise in your response.

The Committee is grateful for the way you engaged with it during the course of this inquiry. However, your response has raised a number of issues which need clarification.

During the inquiry many stakeholders recognised that there has been progress in recent years on MPA management. The key issues they raised with Members were:

- the need for the Welsh Government to take a stronger leadership role,
- the need for appropriate levels of resource, both staffing and finances, and
- the need for greater transparency and efficiency in work that is already ongoing.



Unfortunately, your response does not adequately address a number of these concerns or fully address our recommendations. I have set out several questions below, which I hope will enable you to clarify your position.

Recommendation 1 – The Committee recommends that for Wales to realise the benefits of its MPAs, sites must be managed effectively. The Welsh Government must provide leadership on this matter by developing, as a matter of urgency, an MPA strategy and ensuring that all management authorities, including the Welsh Government, are actively engaged in MPA management and fulfilling their duties and responsibilities.

Welsh Government response – Accepted.

As you will be aware, during our inquiry we heard criticism from stakeholders about the lack of leadership from Welsh Government. Despite accepting the recommendation, there is nothing in the response to suggest that the Welsh Government will be doing anything differently as a result of accepting this recommendation. Can you explain how you will address the concerns expressed by stakeholders?

The response does not explain what the Welsh Government will do to ensure that all management authorities, including Welsh Government, are actively engaged in MPA management and fulfilling their duties and responsibilities. Please provide us with details of the actions you intend to take to give effect to this part of the recommendation.

Could you provide the Committee with a copy of the MPA Management Priority Action Plan, to which you refer in your response, and which will be in use from April 2018? If you are unable to provide a copy, please can you indicate when you expect the plan to be finalised?

Recommendation 2 – The Committee recommends that MPAs cannot be managed effectively without the appropriate level of resources, including funding and staffing. The Welsh Government must: ensure it has sufficient



staffing to deliver its marine conservation responsibilities; bring forward proposals for funding an area-based approach, with each management area having a dedicated officer; and ensure that Natural Resources Wales has sufficient resources to undertake its responsibilities for MPA management and improvements to the condition of the Wales Natura 2000 Network.

Welsh Government response – Accepted in principle.

The Committee notes your comments that all staff in the Marine and Fisheries Division are involved in sustainable marine management to some extent. Can you confirm that you are satisfied that current staffing levels are sufficient to deliver the Welsh Government marine conservation responsibilities?

This recommendation refers to the need to bring forward proposals for funding an area-based approach. What actions are you taking to respond to this? The Committee notes that you support the view of the Steering Group, which concluded it would be more cost-effective and provide better value for money, to focus on specific projects, rather than an area based approach. Can you provide the Committee with the details of any cost and benefit analysis undertaken by the Group of the various potential approaches?

As soon as possible, can you provide the Committee with an update on the Steering Group's assessment of whether more collaboration and sharing of best practice is necessary and, if so, how that will be achieved? Is it intended that this will be addressed in the MPA Management Priority Action Plan?

Your response refers to Natural Resource Wales' (NRW) capacity to deliver its statutory responsibilities within its existing funding allocation. Do you expect NRW to deliver any non-statutory functions in relation to MPAs, such as improvements to the Wales Natura 2000 Network? Are you satisfied that NRW will be able to undertake such work without needing additional funds?

You told the Committee you would raise funding issues directly with NRW in your monthly meetings with them. What are the results of those discussions?



Recommendation 3 – The Committee recommends that the Welsh Government must increase public awareness of MPAs and improve its engagement with stakeholders and the public. It must also operate in a more transparent and efficient way, publishing information about the activities of the specialist groups it leads and ensuring stakeholders are fully engaged in the development of the MPA strategy.

Welsh Government response – Accept

During our inquiry, stakeholders felt strongly that there was a lack of transparency in relation to the meetings of the considerable number of groups involved in this field. Although the Committee is pleased that you have accepted the recommendation, there is no sign in your response that you plan on doing anything differently in future. Given that you have accepted this recommendation, can you explain what actions you will be taking to address stakeholders' concerns?

The recommendation also refers to ensuring that Welsh Government and the considerable number of specialist groups it leads operates in a more efficient way. What work has been undertaken to ensure that the all of the specialist groups are necessary and have clear objectives without unnecessary overlaps in responsibilities?

In terms of wider engagement, you refer to specific actions during 2018 as part of the Year of the Sea campaign. What are your department's plans for wider engagement during 2018 and beyond?

Recommendation 4 – The Committee recommends that the Welsh Government should develop an enforcement strategy, based on risks, which addresses all pressures on MPAs – including water quality; litter; recreational pressures; fisheries and unregulated marine resource gathering – and should move quickly to implement management measures in MPAs where there are known risks.



Welsh Government response – Accept in principle

In your response to this recommendation, you refer to the “National Plan for Managing our Network of MPAs”. Is this the same as the MPA Management Priority Action Plan, to which you refer in your response to Recommendation 1? If it is a different plan, could you explain its purpose, whether it is a Welsh Government plan, and provide the Committee with a copy?

In your response, you state that the Welsh Government already operates a risk-based and intelligence-led approach to marine enforcement. Please can you provide recent examples of successful interventions that have arisen as a result of this risk-based approach?

Recommendation 5 – The Committee recommends that the availability of data, evidence and research is central to MPA policy development and management. The Welsh Government should establish a Wales marine science partnership to bring together industry, academia and stakeholders. The Welsh Government must also ensure it has in place effective data and research for MPA management, including monitoring and surveillance.

Welsh Government response – Accept in principle

The Committee recommended that industry, academia and stakeholders should be involved in the Welsh Government’s approach. Can you confirm to what extent those three groups are involved in the NRW work with the Joint Nature Conservation Committee, as outlined in your response?

What assessment have you made of the potential for the establishment of a Wales marine science partnership, bringing together industry, academia and stakeholders?

What actions are you taking to ensure you are satisfied that relevant bodies and organisations will have sufficient resources to interpret the data that is being



collected? Please can you set out how you will ensure that marine science monitoring and research is coordinated and focuses on your priority areas?

Recommendation 6 – The Committee recommends that when designating MPAs in the future, the Welsh Government should set out the resources necessary for the associated management, monitoring, surveillance and enforcement that site(s) will require and how such resources will be provided.

Welsh Government response – Accept

The Committee welcomes your response to this recommendation. However, the response does not address the final point of the recommendation, which asked the Welsh Government to specify how resources for the management, monitoring, surveillance and enforcement will be provided. Can you inform the Committee of the actions you will be taking to give effect to this part of the recommendation?

Recommendation 7 – The Committee recommends that the Welsh Government should define its understanding of an Ecologically Coherent Network of MPAs in Welsh waters and work with stakeholders to address gaps in the network.

Welsh Government response – Accept

In your response you refer to your written statement of 2 May 2017, in which you stated: “I have asked my officials to work in partnership with our marine stakeholders to consider and recommend the necessary action to address the gaps identified. I have requested this work considers gaps identified in the Welsh offshore region also, which will become the responsibility of Welsh Ministers in April 2018.”

Given the tight deadline for this work we would be grateful for an update on progress as soon as possible.



Recommendation 8 – The Committee recommends that a cornerstone of MPA management is recourse and access to justice. The Welsh Government must ensure that future arrangements in are in line with the Aarhus Convention and not prohibitively expensive for applicants.

Welsh Government response – Accept

The Committee would be grateful if you could keep us updated of progress in this area.

Recommendation 9 – The Committee recommends that the Welsh Government must assess the likely impact of exiting the European Union on Welsh MPAs, including whether designation and management can be harmonised, and commit to no loss of protection under future arrangements. It must also seek agreement with the UK Government about how marine environmental protections will be managed coherently in cross-border marine areas.

Welsh Government response – Accept

Given that you have accepted this recommendation, we would be grateful if you could provide the Committee with details of the assessments you have made of the impact of exiting the EU on Welsh MPAs.

Could you also provide the Committee with details of any early consideration that has taken place of policy changes as a result of exiting the EU, including the potential harmonisation of designation and management?

Can you update the Committee with details of work that is being undertaken or discussions that are ongoing in relation to the management of cross-border marine areas?



Recommendation 10 – The Committee recommends that the Welsh Government should ensure that reporting of Welsh MPA site condition and status currently required under European legislation is undertaken regularly after the UK exits the European Union, with reports published and provided to management authorities in a timely manner.

Welsh Government response – Accept in principle

In your response, you refer to a project to assess how NRW can produce site condition reports on a more regular basis. Can you give an indication as to when that project will conclude and could you share with the Committee the conclusions of that project in due course?

Recommendation 11 – The Committee recommends that the Welsh Government should work with the UK Government to ensure Wales’ fisheries resources and the interests of the Welsh fleet are fully protected in Brexit negotiations. Future Welsh fisheries management arrangements should take into account the Wales National Marine Plan and a Welsh MPA strategy.

Welsh Government response – Accept

Your response says that you will continue to work with the other Devolved Administrations and the UK Government to secure the future of the Welsh fishing industry. Please can you update the Committee on progress of this work? Could you also provide an update on your input into the UK Government’s forthcoming Fisheries Bill?

Recommendation 12 – The Committee recommends that the Welsh Government must explain how it intends to address the potential shortfall in funding for MPA work that is currently met by EU funds, such as the European Maritime and Fisheries Fund and LIFE–Nature.

Welsh Government response – Reject



The Committee notes your explanation for rejecting this recommendation. What assessment have you made of the levels of funding needed to replace funding currently being met by EU funds? Furthermore, what impact will the loss of those funds have on MPA work in Wales?

The Committee has asked the Business Committee to schedule a Plenary debate on the Committee's report on 8 November. I would be grateful if you could respond to this letter by 1 November, so that your response can inform the Plenary debate.

Yours sincerely,

A handwritten signature in black ink that reads "Mike Hedges". The signature is written in a cursive style and is followed by a long, sweeping horizontal line that extends to the right.

Mike Hedges AM

Chair of the Climate Change, Environment and Rural Affairs Committee



Agenda Item 8

By virtue of paragraph(s) vi of Standing Order 17.42

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