

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Cymru Sero Net / Net Zero Wales
NZ05
Ymateb gan Comisiynydd Cenedlaethau'r Dyfodol Cymru /
Evidence from Future Generations Commissioner for Wales



Dear Senedd Climate Change Committee,

I welcome the publication of “Net Zero Wales – Carbon Budget 2”, specifically the sense of urgency woven through the plan highlighting that the next 10 years needs to be ‘a decade of action’ to avoid catastrophic impacts on current and future generations.

I am pleased to see the Well-being of Future Generations Act being used in framing the overall approach to the plan; with a focus on the five ways of working, focussing on the ‘how’ as well as the ‘what’, as well as taking an integrated approach across policy areas, with links to existing strategies highlighting the cross-governmental approach needed to tackle the climate and nature crises.

It is also good to see Welsh Government committing to a number of actions I had recommended in my [Future Generations 2020 Report](#) including placing carbon reduction at the core of future city and growth deals, introducing further carbon reductions in building regulations, developing innovative construction techniques, promoting and supporting locally owned energy developments, exploring Mobility as a Service, a focus on a circular economy and prioritising green and clean jobs fit for a decarbonised economy.

However, I believe the Government should have gone further and made bolder and more ambitious commitments in a number of areas:

- While I agree that we all have a role to play in tackling climate change, it is undoubtedly for the Welsh Government to lead the way – a fact I believe could have been highlighted more strongly throughout the plan.
- Although I welcome a focus on key considerations such as just transition and consumption emissions, the Plan lacks detail on how exactly the government plans to address this. There is a lack of connection to equalities strategies, with no reference made to race or gender nor to the recently published Race Equality Action plan, which is a missed opportunity. I recently published a report – [Inequality in a Future Wales](#) – which highlights the fact that climate change is an equality issue, and I would urge Welsh Government to consider my recommendations in how they progress this work.
- I am also pleased to see a focus on education (through commitments in the new curriculum) and skills for a green recovery; my work with the New Economics Foundation has highlighted this is a critical issue and gap in terms of delivery and the forthcoming Net Zero Skills Plan will need to reflect the scale of the challenge. Developing courses, teaching capacity and qualifications in new industries takes time so it is imperative Government stimulates economic demand in the sectors identified in the Net Zero Wales Plan and assists educators and providers to move us closer to eco-literacy and the skills needed to meet our net zero targets.

- I would like to see firmer commitments when it comes to the government's budget – there is a disappointing lack of clarity provided on the approach that government is taking to assess the carbon impact of budget decisions and no commitment to adopting a 'net zero test' as recommended by the UK Committee on Climate Change.
- Although it's positive to see a commitment to making Carbon Reduction Plans a mandatory part of procurement tenders for Welsh Government contracts over £5m, we already know that procurement is a key issue in terms of emissions and my recent section 20 review identified a worrying lack of detail and understanding from public bodies on the importance of considering the climate impact of their spending decisions. The Government must ensure there are clear policy and legislative requirements for this to happen across all public spend including procurement and must also provide support to public bodies to get this right (see further recommendations in my "[Procuring Well-being in Wales](#)" Report). I would also urge the Government to take more ambitious actions e.g. to tackle deforestation impacts of Welsh imports as highlighted in a recent WWF/Size of Wales report.
- It is also concerning to see an omission of commitments when it comes to divesting public sector pensions from the fossil fuel sector, as well as the lack of detail when it comes to aviation – an area of high emissions, which Welsh Government continues to fund.
- I welcome the commitments relating to tree planting and peatland restoration, but a link here could have also been made to skills and how, for example, a National Nature Service could unlock multiple benefits for the economic, social, environmental and cultural well-being of Wales. This should also be extended to include an aspiration to make Wales the most eco-literate nation in the world creating high quality eco literate jobs which will deliver long-term benefits for individual well-being, the economy and the ability to meet our future ambitions to enhance, maintain and restore biodiversity.
- The cultural dimension of well-being is also scarcely mentioned throughout the strategy, nor the role that this could play in, for example, behavioural change and raising awareness of climate issues. A link could have been made here to the Freelancer Pledge and how the public sector could use that in its efforts around climate change.
- As mentioned above, some of the commitments seem unambitious and not bold enough to take us to where we need to be by 2025. I am uncertain, for example, why an action plan for the food & drink manufacturing sector would take until 2026 to prepare; and also why only 50% of economic contracts will need to include at least one pledge to reduce emissions or become more climate resilient by 2025. There are clear issues with both monitoring of how the economic contract is being delivered and the mechanisms which business can access for support on this. There is an opportunity to drive private sector activity around meeting Wales' well-being goals and specifically decarbonisation but this does not have significant focus in the plan.
- The targets for transport modal shift (public transport mode share from 5% to 7% by 2030) also seem unambitious in light of the fact that emissions have only decreased by 6% since the 1990 baseline and that the car continues to be the predominant mode of transport used in Wales. Much more urgent and ambitious action is needed in this area building on the positive policies the Welsh Government have implemented recently.
- The policies relating to business and industry could have also been made firmer – Welsh Government need to use every lever at their disposal to ensure businesses take action on net

zero. Welsh Government should ensure public sector procurement, Business Wales, the Economic Contract, trade and export support, Development Bank Wales and all Welsh Government challenge funds which support and finance business in Wales should be dedicated to getting to net zero - and should set targets and standards to get businesses to commit to a net zero pathway.

Nonetheless, the current plan is still a marked improvement on the previous strategy and the focus should now be on turning these ambitions into reality at pace, ensuring a just transition for all.