

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Cymru Sero Net / Net Zero Wales
NZ11
Ymateb gan WWF Cymru / Evidence from WWF Cymru



WWF Cymru's Written Submission to Climate Change, Environment, and Infrastructure Committee request for initial views on Welsh Government's Net Zero Carbon Budget 2

WWF Cymru is focusing on land use and the wider food system in Wales this Senedd term as it is a critical issue to tackle climate change, the nature crisis and secure the well-being of future generations. Our submission therefore focuses on this area. Generally, we are pleased with recognition of this issue throughout the Net Zero Plan but we want more detail on the emission impacts of policies and programmes. We also think it is essential that Welsh Government builds in stakeholder engagement to further shape the policies and proposals in this plan and create a 'Team Wales' approach.

A whole food system approach

WWF Cymru very much welcomes the food system approach apparent throughout the Plan. It recognizes the need not just to reduce emissions in the agriculture sector, but also the relationship of food production to the wider system changes needed to support transformation. These include:

- Consumption: recognition of the role of dietary change and individual behavior change
- Role of market: the need to support the transition to more sustainable production through the creation of local markets for sustainable products and the promotion of purchasing local and seasonable food
- Procurement: references the need for procurement to enable shifts in purchasing of local sustainable products
- Avoid offshoring: how this must be done to prevent the environment impact of food being transferred abroad.

Areas we would like the plan strengthened:

- More recognition in the 'green skills' requirements for regenerative farming and wider nature restoration, as the current focus is largely

on infrastructure jobs such as renewables and retrofitting. Expansion of the agriculture workforce and increasing knowledge and skills in the existing sector is vital to transition to nature and climate friendly regenerative farming practices and achieve Welsh Governments ambitions for the Sustainable Farming Scheme (SFS).

- We suggest Welsh Government works with stakeholders (including WWF Cymru and Food Policy Alliance Cymru) to explore in detail whether the EatWell Guide principles are the most up to date guidelines, and the impact of this shift on all elements of the food system including how this relates to land use shifts. The UK CCC Advice to Wales provides detailed suggestions which are not present in the Plan.
- In our recently launched 'Wales and Global Responsibility' report, we evidence the impacts Wales is having overseas on deforestation and habitat loss as a result of its supply chains. Given our evidence base, we believe the Net Zero Plan needs to be strengthened to account for and report on the significant greenhouse gas emissions caused by Wales overseas as a result of the deforestation and habitat loss associated with Welsh imports of commodities.

Agriculture Sector

In the first low carbon budget plan published in 2019 there was a target to reduce agricultural emissions by 28% by 2030. However, this target is not obviously present in the Net Zero Carbon Budget 2. Without this target it is difficult to judge the ambition for this sector is at scale and pace required and whether the policies and programmes outlined in the plan ladder up to the emission reduction required. WWF Cymru believes sectoral targets are an important governance tool to enable sectors to understand their role in achieving Wales' overall net zero target and provide a way to measure progress. This is particularly important given the lack of progress on agriculture emission reduction over last 20 years. WWF Cymru recommends a target for the agriculture sector is developed with the relevant evidence base and stakeholder engagement. We welcome the integration of the Sustainable Farming Scheme (SFS) into the Plan and understand how important this scheme will be for driving down emissions in the agriculture sector. However, with no detail on the emission impact of this scheme we do not know if its sufficient to develop changes in the agriculture sector to meet net zero. We are also concerned over the gaps in policies and action between now and the start of the SFS in 2025. Without significant support to lower emissions in this sector, emissions could continue to rise as they mostly have done since 2007. We need to better understand what support there will be for emissions reductions in agriculture and support for land sequestration between now and 2025.

Nature crisis and nature positive approach to net zero

We very much welcome the recognition of the inter-connectedness of the nature and climate crisis and it represents a significant shift in understanding the importance of nature since the Low Carbon Plan 2019.

Many of the programmes referenced relating to nature protection and restoration in the Plan (Nature Recovery Plan and SFS) are welcome but there is no sense in

the Plan how these will add up to the scale and pace of change needed to address the nature and climate crisis. Specific programmes such as Peat Bog Restoration commitment are not sufficient – Wildlife Trust Wales says at this current rate of restoration, it will take over 112 years to achieve restoration of peatlands in Wales. This isn't a timetable to respond to a crisis.

We recommend that Welsh Government work with stakeholder to explore this issue further especially the impact of agriculture changes through SFS will add to these investments in nature restoration and whether these are enough to tackle the dual crisis. The UK CCC advice for Wales on land use change for nature restoration is not taken in this Welsh Government Net Zero Plan so stakeholders need to understand in more detail the Welsh Government's approach for use of land for the triple challenge of climate, nature and food production.