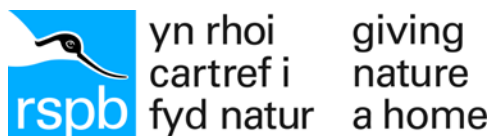


Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /  
Climate Change, Environment and Infrastructure Committee  
Cymru Sero Net / Net Zero Wales  
NZ17  
Ymateb gan RSPB Cymru / Evidence from RSPB Cymru



## Climate Change, Environment and Infrastructure Committee: Scrutiny of Net Zero Wales

November 2021

RSPB Cymru is grateful to the Committee for reaching out to seek input to support its scrutiny of the Net Zero Wales Plan ('the Plan'). We do not have capacity to provide written evidence but welcome the opportunity to suggest key themes.

It is welcome that the Plan includes a section on the **nature emergency and recognition of its interconnectedness with climate change**. However, the Plan is light in terms of recognising the potential for damage to nature via pursuing climate change-focused actions (and vice versa). As highlighted in the recent joint [IPBES/IPCC Biodiversity and Climate Change Report](#), "*Only by considering climate and biodiversity as parts of the same complex problem can solutions be developed that avoid maladaptation and maximize the beneficial outcomes*". We would welcome the Committee giving some attention to how these interactions will be taken into account and the protection and restoration of nature ensured and aligned with the push for net zero.

We fully support and welcome the stated ambition to '*restore the damage done to our protected sites, habitats and species, and future proof them against further decline*', but we note that this is an enormous task! A step change in resourcing to drive nature's recovery is needed – including to rebuild capacity in NRW to secure management and monitoring of protected sites.

Related to this, we note that the Plan mentions supporting NRW to work on marine renewables: *Natural Resources Wales (NRW) has a key role to play in advising on future opportunities for marine renewable energy and we are working with NRW to continue the Offshore Renewable Energy Programme (OREP)*. Whilst this is welcome, we note the importance of NRW's advisory role in relation to individual applications for development (which is necessarily separate from the role of the licencing team). Experts within NRW are called on to provide specialist advice in relation to development proposals and are experiencing significant demand. We are concerned that this impacts upon the capacity available to deliver proactive conservation measures and initiatives. This reinforces the point above, that NRW's resource for nature conservation functions, including provision of advice, also needs additional support.

### **We would encourage the Committee to explore the role of nature based solutions in detail.**

Nature-based solutions (NbS) are increasingly seen as an important strand of governmental approach to meeting environmental challenges. However, there appears to be a tendency to focus on the climate emergency with woodland creation the main response. Priority must be given to

restoring and maintaining habitats that already store and sequester large amounts of carbon e.g. peatlands. It appears to us that much more focus is given to tree planting than to protecting and restoring peat, with investment under the National Peatland Action Plan relatively small. We would encourage the Committee to consider exploring this with the Minister.

To be used effectively NbS need to be well-designed and managed at the landscape scale by stakeholder partnerships that include local communities. This will ensure the right interventions are used in the right place to protect, restore, connect and enhance the natural assets that underpin the resilience of our economies, health and well-being, providing benefits for both people and nature.

A new report on [Nature-based Solutions in Climate Adaptation Policy](#) shows how NbS can help to address 33 of the 34 risks identified in the third [UK Climate Change Risk Assessment](#) (CCRA3) and how they can be better integrated Welsh Government policy.

Wales' new **Agriculture Act and Sustainable Farming Scheme** present us with a unique opportunity to use public funds to pay farmers for delivering environmental enhancements, including restoring nature and tackling climate change. Adopting an integrated approach to land management so that it secures multiple benefits is essential if we are to address pressing environmental and social challenges, avoid negative consequences and secure value for money, as highlighted in the recent UN report [Making Peace with Nature](#), which states “The interconnected nature of *climate change, loss of biodiversity, land degradation, and air and water pollution means they must be addressed together to maximize the benefits and minimize trade-offs.*”

The Plan includes welcome commitments to research into *blue carbon habitats* but we would stress that non-coastal habitats (ie. the seabed) are important carbon stores and this should not be overlooked. The impact of marine development on blue carbon habitats at sea should be a priority for consideration.

There is also welcome reference to the potential and opportunities for decarbonisation of fishing activities, aquaculture and the fish supply chain. A new report by the RSPB, WWF and MCS covers a range of relevant issues: <https://www.rspb.org.uk/our-work/rspb-news/news/stories/climate-smart-fisheries-report/>