

P-06-1225 Make Natural Resources Wales undertake and publish annual wildlife surveys before felling woodland, Correspondence – Petitioner to Committee, 02.12.21

Dear Committee

Re: Petition P-06-1225

Thank you for sending me the Minister's response (Ref JJ/11977/21).

My petition sought Natural Resources Wales (NRW) to publish survey data before and after timber operations:

'To avoid biodiversity loss they [NRW] should assess the size of rare species populations present before felling operations are undertaken, so that they ensure habitat loss does not cause decline. The population data should be published before any trees are sold for cutting.'

The petition highlights the need for transparency with regard to the impacts of felling on rare species. To assess impact requires an understanding of abundance before and after operations that quantifies population abundance. Qualifying that a species is present or likely to be present after operations is not the same thing at all. The latter does not allow decline to be identified nor its potential scale predicted.

I feel that the Minister has not addressed the core of the petition directly. In the final paragraph she writes that survey data collected to inform Forest Resource Plans is not shared due to sensitivity. What are the sensitivities? One could imagine a need to redact information if a species was at risk from wildlife crime or accidental disturbance. With regard to great crested newts, bats, dormice and red squirrel this is very unlikely, indeed NRW often highlight species are present at a site.

As we have seen recently with red squirrel on Anglesey, NRW had no population monitoring data: <https://www.thenational.wales/news/19304998.expert-raps-nrw-felling-red-squirrel-habitat/> However this only appears to have been disclosed following local scrutiny. I worked on Anglesey 20 years ago and was very surprised to read this.

If we look at fisheries management, <https://naturalresources.wales/evidence-and-data/research-and-reports/terrestrial-and-freshwater-species-reports/index-river-monitoring-for-salmon-and-sea-trout-on-the-welsh-dee/?lang=en> NRW are keen not to base population change on whether a river or riparian habitat still exists and

instead quantify population and change. NRW Forestry dept simply is not doing this and rely upon a generic 'habitat approach'.

The Minister mentions UK WAS and NRW Design planning and consultation as delivering conservation. Again this is an oblique habitat approach. Plans last a decade and in the interval between public consultation at draft stage, wildlife populations may have changed dramatically in the face of environmental factors e.g. pathogenic disease, inbreeding depression etc.

Failing to monitor means management is blind to spatial and temporal change in species abundance. This leads to a risk that felling may occur in precisely the worst location e.g. if wider animal populations had succumbed to disease and a residual was in one localised area.

I believe that NRW simply do not always undertake necessary survey to be able to assess felling effects on population viability. By not publishing information before felling occurs, the strength or weakness of the NRW understanding of mammal populations is not made clear. A public body should be taking the lead and publishing assessments would ensure this.

Warm Regards,