



Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /  
Climate Change, Environment and Infrastructure Committee  
Adferiad Gwyrdd a Mesurau llywodraethu amgylcheddol dros dro/  
Green Recovery and Interim environmental governance arrangements  
GR / IEG 03  
Ymateb gan Coed Cadw / Evidence from Woodland Trust

## **Climate Change, Environment and Infrastructure Committee on 30 June: Environmental governance and green recovery.**

Response to questions by Coed Cadw – the Woodland Trust

Coed Cadw -The Woodland Trust is the UK's largest woodland conservation charity, working for a UK rich in native woods and trees, for people and wildlife. In Wales we have over 26,000 supporters. We manage over 100 sites in Wales covering 2,897 hectares (7,159 acres). Wales is one of the least wooded countries in Europe, with woodland making up just 14% of the landscape and less than half of this is native woodland

### **Interim Environmental Governance Measures**

#### **1. Your experience of the operation of the Interim Environmental Governance Measures to date;**

- 1.1. We welcome the interim measures but support the call by Wales Environment Link to bring forward legislation as soon as possible to secure permanent measures. The delay hopefully is allowing the Welsh Government to assess the effectiveness of measures taken in England and Scotland and plan truly effective measures for Wales.
- 1.2. We think it is essential that there is an effective and independent environmental body to hold public authorities to account on their environmental commitments.
- 1.3. Such a body should emulate the oversight and enforcement provided by European institutions by enabling citizens to raise complaints, free of charge and where necessary carry out investigations that support court action.
- 1.4. The Interim Assessor has carried out a substantive investigation on woodland protection but we cannot judge its impact or effectiveness as nothing has as yet been published.
- 1.5. There does not appear to be any readily available information on topics of active interest to the Assessor or on how evidence is gathered for the preparation of reports. We were able to provide input to the investigation on forestry matters but not to that on hedgerows.
- 1.6. It is unclear how the Assessor interacts with the Well-being of Future Generations Act and the Future Generations Commissioner, or with the wider suite of enforcement bodies. Effective environmental governance requires all these aspects to work well together.

- 1.7. Wales is showing international leadership in commitments and mechanisms to achieve sustainability and climate goals and with the foundation provided by the WBFG Act Wales has the opportunity to put in place truly world leading environmental protection and governance.
  - 1.8. Reports will not be published until a response has been obtained from Welsh Ministers. Transparency is needed regarding the influence of Government Ministers on the content of reports and the independence of the Assessor.
- 2. Examples of relevant environmental matters that have and have not been addressed since the disapplication of the EU environmental governance structures in Wales following EU withdrawal.**
- 2.1. In general, governance is needed to address the gap between policy ambition and the willingness and ability to enforce that ambition. Otherwise, governments can enact attractive sounding policies with little intention of delivery.
  - 2.2. Relevant matters include the lack of or failure of regulation to protect water quality, air quality in relation to ammonia emissions, ensure the monitoring and management of sites protected for nature; or protect ancient trees and woodland and prevent declines in urban and rural tree cover.
  - 2.3. We know that many aspects of the condition of trees and woodland are in general decline ([The State of the UK's Woods and Trees](#)) despite numerous policy commitments and initiatives. We know policies are under consideration that may make matters worse, for example in relation to biosecurity and carbon accounting.
  - 2.4. There are examples of policy and regulation being ineffective because of lack of basic environmental monitoring information, for example on the condition of protected sites and on water quality.
  - 2.5. Numerous matters of potential concern have been highlighted by the Future Generations Commissioner and many others, for example in relation to the ineffectiveness of the planning system in preventing habitat degradation and pollution.
  - 2.6. The complexity and confusion of interactions between UK and devolved responsibilities and law make it difficult to clearly understand how environmental governance is now achieved.
- 3. Any comments on the Interim Environmental Protection Assessor's report**
- 3.1. We found the Assessor's report concise and readable.
  - 3.2. We welcome the interest in hedges, which we were not aware of.
  - 3.3. It is apparent that only a minority of submissions are judged suitable for consideration, suggesting that the Assessor's remit is very limited and that it is difficult to prepare effective submissions. There is no discussion of social justice dimension - ensuring that environmental justice is fairly and readily available to everyone.
  - 3.4. It is noted that demand for the service has been higher than expected. This is despite the low profile and limited scope of these interim measures.

## **Green Recovery**

### **4. Progress in taking forward the ‘priority actions’ identified in the Green Recovery: Priorities for Action report;**

- 4.1. The “Priority Action” we are most actively taking forward is on urban tree cover – submitted as a “Tree Towns” proposal. We have been able to continue discussions with an informal external stakeholder group and have been able to bring some funding from a UK corporate partner to support work by Cardiff Council.
- 4.2. We continue to work closely with Wrexham Council and will shortly publish an independent review of their experience in preparing their Tree and Woodland Strategy and the barriers they have experienced in implementing it.
- 4.3. At UK level we are working with the US charity American Forests and Centre for Sustainable Healthcare to commission work to gather data on tree equity in the UK – mapping inequalities in tree cover and combining this information with socio-economic data sets to identify where lack of tree cover and green space is contributing to social, health and economic deprivation
- 4.4. NRW have been very supportive of this work but no significant additional resource has been forthcoming through any green recovery initiative.
- 4.5. There are wider developments which if sustained at scale will lead to a greener economy. These include investment shifts from road building to active travel and green infrastructure; support for more sustainable farming; shifting of some flood prevention funding to land management measures; and disinvestment in fossil fuels in favour of energy efficiency and renewables.

### **5. Progress in taking forward the recommendations in the Green Recovery: Supporting the environmental sector in Wales report;**

- 5.1. The observations made in the 6 “recommendations” made in the report are largely still current and the main challenges remain, including:-
  - *“building reliable, predictable and efficient funding within this sector”*
  - *“Whether it is the lack of resource, the inexperience, the culture or the competitive funding environment, there is a strong sense that insufficient collaboration is taking place.”*
  - *“....NRW is stretched at present, and that a better-resourced organisation could do even more to support the wider eNGO sector.”*
  - *“.....strong support for the idea of a Green Recovery for Wales and agreement that we cannot continue with “business as usual”. Far more needs to be done to support innovation and to bring about the conditions that promote it.”*

### **6. The development of the National Nature Service for Wales.**

- 6.1. We remain interested in the concept of a National Nature Service but have not been in a position to actively commit resource to program development. For us there are structural challenges to gearing up to employ significant numbers of additional and



inexperienced staff and we would need there to be funding and a support framework in place to make that a possibility.

- 6.2. At present the concept of a new “green jobs” initiative appears stuck by barriers of program development resource, funding and possibly labour availability. We currently have [31 vacancies](#) available at UK level.

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