

ROCP 24, Friends of the Earth Cymru

Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee

Adolygiad o flaenoriaethau'r Pwyllgor ar gyfer y Chweched Senedd | Review of the Committee's priorities for the Sixth Senedd

Ymateb gan Cyfeillion y Ddaear Cymru | Evidence from Friends of the Earth Cymru

Your views

1. What are your views on the Committee's three strategic priorities: Climate Change; Sustainable Communities; and Protecting and enhancing the natural environment?

We fully support those.

2. To what extent are the Committee's three strategic priorities still relevant, reflecting on social, economic and environmental developments since they were set at the start of the Sixth Senedd?

Climate science tells us we are heading very rapidly towards catastrophic climate tipping points so it is now more important than ever that we seek to reduce all of our emissions as quickly as possible and do so in a way that protects and enhances nature and protects and provides opportunities for the people and communities of Wales.

3. What are your view on the Committee's detailed priorities/outline programme of work for Years 3 to 5 of the Sixth Senedd (set out in its report, Priorities for the Sixth Senedd?)

Whilst being very supportive of the priorities and work programme and obviously being mindful of limited capacity issues, we would also like to see some different issues and topics also be discussed and looked at in more detail, ones that have not been in the political or public eye as much as some of the more traditional issues. We believe there are many 'low hanging fruit' that could be tackled quickly in Wales which would not only help protect our planet but also be of benefit to people, communities and the economy in Wales. There are actually an awful lot of these sorts of issues, some bigger, some smaller, that if considered together would

be obvious how they all dovetail together. We detail a few of them in our response here.

4. To what extent are the Committee's detailed priorities/outline programme of work still relevant, reflecting on social, economic and environmental developments since they were set at the start of the Sixth Senedd?

See above answer.

5. Are there any other matters related to the Committee's priorities/work programme/ways of working that you would like to comment on?

Friends of the Earth Cymru feel that there are also some issues that are somewhat slipping under the radar here in Wales. Attempts to persuade Welsh Government to address these issues in more detail have been unsuccessful. We feel that the relatively recent UK Climate Change Committee Progress Report makes it clear that we in Wales still need to increase our efforts on reducing climate change emissions and the ways we outline below would help in that regard. It is vital that we seek out ways to stimulate more action across the board and that we don't just settle for the status quo.

Further investigations by the Senedd's Climate Change, Environment and Infrastructure Committee would certainly help raise the importance of these issues as well as the opportunities that would arise from taking strong action on them.

Methane Action Plan

One thing that Friends of the Earth Cymru are keen to see progress on in Wales is the drawing up of a new **Methane Action Plan**.

We note that the recent UK Climate Change Committee Progress Report recommends that Welsh Government *'Set out policies or support to capture methane emissions from landfill sites, in addition to improving the monitoring of emissions.'*

We would suggest that there is an even better way of tackling this issue. Namely to now pull together a strategy to address **ALL** methane emissions in Wales, not just those from landfill sites.

We know that methane is a **short lived** but hugely important and nasty greenhouse gas. Over a 20 year period for example, it is around **80 times more potent** at heating our climate than carbon dioxide (CO₂). It also accounts for around 30% of global heating since pre-industrial times.

Methane is also known to contribute to the formation of ground-level ozone which as we know is a dangerous air pollutant. This is linked to approximately half a million premature deaths per year globally and also harms crops and ecosystems.

The **UN Environment Programme** (UNEP) states that:

'Human-caused methane emissions could be reduced by as much as 45 per cent within the decade. This would avert nearly 0.3°C of global warming by 2045, helping to limit global temperature rise to 1.5°C and putting the planet on track to achieve the Paris Agreement targets.'

One positive thing that came out of the UN climate change talks in Glasgow in 2021 (COP26) was the **Global Methane Pledge**.

The US and the EU led on this Pledge, which now has around 150 100 countries signed up to it (including the UK Government). The pledge itself commits countries to work together to collectively reduce methane emissions by at least 30% below 2020 levels by 2030.

50 of these countries have developed, or are now developing, their own methane action plans.

Methane is released from a variety of sources, some more well-known than others.

The **industries** responsible for most methane emissions are oil, coal, gas, agriculture, waste and waste water.

The paper linked above breaks these down as follows:

Agriculture – responsible for 40-50% of anthropogenic emissions

Oil & gas – 20-25%

Coal (working and abandoned mines) – 10-15%

Solid waste (landfills / tips / dumps) – 7-10%

Wastewater – 7-10% (breakdown of organic material in wastewater streams)

In Wales we know Welsh Government doesn't directly collect data on methane emissions but we do have estimates for these emissions via data from the **National Atmospheric Emission Inventory** (NAEI) which is published annually and contains details on estimated methane emissions in Wales by sector.

We also know that in Wales, different Welsh Government strategies and policies will be responsible for reducing methane emissions within their sectors such as Net Zero Wales, Agriculture (Wales) Bill, Beyond Recycling, circular economy, Landfill Directive and wastewater treatment.

What we are however missing is a collective view of methane emissions across the board and a coordinated plan to deal with them all.

We feel that this is now the correct moment for Wales to develop its own national Methane Action Plan.

As mentioned above, some of the existing policies and strategies we have here already will deal with these emissions in their own sectors. For these, it would only be a matter of transcribing these policies and strategies into a new Methane Action Plan. It doesn't all have to be done from scratch by any means.

This would then be supplemented by action needed across sectors that aren't currently covered by existing strategies. One example might be methane escaping from old, abandoned coal mines in Wales.

Given the importance and potency of methane as a greenhouse gas, we feel that a new national Methane Action Plan would complement existing climate emission reduction strategies whilst also indicating our commitment to be part of worldwide methane reduction efforts.

Without this sort of plan, action risks being piecemeal, not joined up and at risk of missing out some important sources of methane emissions.

In terms of what such a strategy might actually look like, we feel that the Swedish example might be a good one to follow

(<https://www.government.se/contentassets/303c37911a6c4a9a895c3b4049b8ee9b/swedens-methane-action-plan---mapping-of-swedens-methane-emissions-projections-policies-and-measures.pdf>)

In UK terms, although the UK Government has signed up to the Global Methane Pledge, if Wales were to develop its own Methane Action Plan, it would make us the first devolved UK nation to do so. Obviously due to the nature of devolution, Wales isn't able to sign the Global Methane Pledge directly but what we can do is

to produce an Action Plan which not all countries who have signed the Pledge have done yet. This would help us position ourselves at the forefront of action on methane and would hopefully encourage others such as some of our partners in the Beyond Oil and Gas Alliance to do so too.

With the world careering towards various climate tipping points, it is imperative that we all do whatever we can to reduce emissions. Coordinated and concerted action on methane emissions is a must when talking about reducing climate emissions.

A new Methane Action Plan for Wales would again show us to be at the forefront of international action on climate change.

We would therefore support an investigation by the Climate Change, Environment and Infrastructure Committee into the issue of non-CO2 climate emissions in Wales and the need for a new national Methane Action Plan which would cover methane emissions from all sources in Wales, not just some.

Water use target

Another issue we would like to see action on in Wales is the development of a much stronger per capita water consumption target for consumers in Wales.

We know this is an issue Welsh Government are concerned with due to their work on **Drought Liaison Group**.

We do however feel that Welsh Government needs to address these issues with far more urgency and that the benefits of stronger, more urgent action will benefit both consumers in Wales as well as the environment and will contribute to climate emission reductions in Wales.

Last year's prolonged dry and hot summer and following water shortages and droughts have brought the issue of water storage and use into sharper focus for all of us in the UK.

Climate science tells us that our changing climate is likely to lead to more frequent longer, hotter, drier summers, even here in traditionally wetter Wales.

It is therefore important that we plan just as effectively for future water scarcity as we have been doing for other actions around climate change such as energy, food and transport.

Our current water consumption is quite staggering. Depending on the source, **figures** would tend to show that in UK every person uses somewhere in the region of **150 litres of water a day**.

If we take into account the water that is needed to produce the food and products we consume in our day-to-day lives (known as **embedded water**) we actually consume around 3400 litres per day. The extra amount comes primarily from the food we eat and the goods we buy (e.g. around **7,600 litres** of water are used in the production of one pair of jeans or over 17,000 litres of water for 1kg of **chocolate**).

There are many positive benefits to reducing water use in Wales:

- At the UK level, the National Infrastructure Committee has called for **mandatory water metering** to be rolled out into every home in the UK by 2030. Currently only around half of households in England and Wales have a water meter installed. Figures show that customers with a water meter use 33 less litres of water per day than those without.
- **Water UK** states that around 3million customers in the UK currently struggle to pay their water bills.

They define water poverty as the ratio of household income spent on water bills. They have 2 thresholds that they measure, one at a 3% ratio, another at 5%. They estimate that here in Wales, 8.7% of households (114,000 households) fall into the 5% threshold and 27.2% (354,000 households) fall into the 3% category.

The Consumer Council for Water (CCW) for example are already running a campaign calling for a single Social Tariff **'that would provide fair and consistent support for low-income households'**.

If our weather patterns continue as they are, with drier springs and summers, bills will undoubtedly keep on rising as we potentially face an annual struggle to provide enough water for all our needs during longer hotter summers.

- The water industry is the UK's fourth most energy intensive sector and **Waterwise** estimates that the industry is responsible for around 1% of the UK's total carbon emissions.

Dŵr Cymru/Welsh Water for example is one of the **largest energy users in Wales** (**500 GWh in 2021** to pump and treat water and wastewater) and currently generate 20% of their own energy needs through renewables.

The Chartered Institution of Water and Environmental Management (CIWEM) state that: 'An important area of **emissions reduction** is associated with reducing the amount of highly treated water that is required to be put into supply'.

We do of course recognise the good work Dŵr Cymru/Welsh Water are doing on the progress towards net zero across their own operations but reducing the amount of water that is needed to be treated and pumped will help reduce our climate emissions in Wales.

- Another sometimes overlooked but potentially quite interesting benefit might be through innovation, research and development, and business in Wales. Whilst a lot of focus will be on the benefits to consumers of reducing water use at home, some of these water savings could be made easier by the introduction of new or existing technological solutions.

Current estimates for example suggest that around 30% of our daily household water usage is for **flushing toilets**. It remains an odd situation, given all the other technological improvements we have made as a society, that we still use drinking quality water to flush our toilets.

In some areas of the world, e.g Japan, they have started to combine a **sink on top of a loo cistern**.

This may or may not be a longer term solution, or at least part of it, but if a company were to develop some new technology that could be retrofitted to existing bathroom plumbing to take grey water from the sink and filter it and feed it into the toilet cistern, then that would potentially be a smart business opportunity for a company in Wales, especially if one thinks of the scale of the opportunities that would result from that. This may even be a research opportunity for a university in Wales.

- Rainwater harvesting is another as yet underused solution. An ambitious and innovative part of the larger solution would be to plan for all new homes and commercial buildings in Wales to have rainwater harvesting systems and then efforts made to plan for retrofitting these to existing properties where practical.

Rainwater harvesting also has a number of other benefits including helping reduce storm water runoff from properties during periods of heavy rain. This can, especially in urban landscapes, help reduce the volume of water discharged into the main drain systems which in turn can help reduce some flooding risk.

We feel that Welsh Government has a central role to play in this sphere in Wales by setting an ambitious water use target for consumers. In the UK, Defra had set an average water consumption target of 130 litres per head per day (l/h/d) by 2030. This sort of reduction (from 150l/h/d to 130 l/h/d) would result in less water being required to be put into supply and deliver associated carbon savings.

In April 2022, the UK Government published their '*Plan for Water*' with an ambition to reduce household water demand by 25% by 2050.

In Wales, we have a target of **110 litres per person per day** in new dwellings.

However, residents of **Copenhagen currently use about 100 litres per person** per day and residents in Brussels are already at **96 litres** per person per day.

It seems odd therefore that both UK and Wales targets are both higher than what is already being achieved elsewhere.

The Code for Sustainable Homes (CSH) for example also sets out **average water consumption levels** per proposed occupant in new build houses, with a range of 120 l/h/d for Level 1, to 80l/h/d or less for the highest levels (5 and 6).

It would seem sensible that we set ourselves an ambitious water use per person per day target here in Wales too.

A target of 80l/h/d would drive a lot of these water saving measures, would encourage grey water use and rainwater harvesting and the possible introduction of new tech, would help reduce water poverty, would protect our precious water resources and would also reduce our climate emissions from this sector. It would also firmly place us once again as a leader on environmental and climate change issues.

Without a stretching and ambitious target, we are unlikely then to see a lot of the changes we need, both now and longer term.

One initial approach might be to facilitate a similar summit and process to the one Welsh Government recently did around **river pollution**. That would be a useful first step and one which would allow stakeholders to discuss the issues and solutions and also maybe even hear from representatives from Copenhagen and/or Brussels on how they have achieved their water use figures.

Strong action now could not only reduce water poverty but also reduce climate emissions and help safeguard our most important natural resource for future generations.

There are also strong cross over links with other sectors such as agriculture with many farmers last year facing the situation where their bore holes and springs ran dry during the drought conditions and then needing to connect to the mains water supply thus further increasing stress on the system

(<https://www.walesonline.co.uk/news/wales-news/welsh-farms-need-thousands-gallons-24731360>). A more comprehensive and wide ranging forward view of these issues would also help farmers for instance catch and store more water on their land.

We would therefore support an investigation by the Climate Change, Environment and Infrastructure Committee into the issue of future water needs in Wales, and the benefits of introducing a new ambitious water use target for consumers in Wales which would help alleviate water poverty, save water, reduce energy use and reduce climate emissions in Wales.

Sustainable Tourism industry

We know how important the tourism sector is to the Welsh economy and to jobs in Wales. We applaud the many initiatives that are currently going on from Welsh Government, through Visit Wales and initiatives such as the Green Key accreditation award.

We also note that tourism is responsible for around 8-11% of worldwide climate emissions, a staggering contribution from a sector that maybe doesn't get as much focus as other sectors such as energy or agriculture.

The recent 'Climate Change Committee Progress Report: Reducing emissions in Wales', highlights many different suggestions and courses of action for further emissions reductions. Some of them will of course cross over into the tourism sector via things like public transport, active travel, EV charging points and increased recycling etc.

One thing we would advocate is for Wales to sign up to the *Glasgow Declaration*. We feel that this relatively easy action would in turn help stimulate further action and become a rallying call for the tourism industry in Wales to contribute to Wales's climate emissions reduction strategies.

The *Glasgow Declaration* (<https://www.unwto.org/sustainable-development/climate-action>) was officially launched at the Glasgow COP26 talks in 2021. It *'.. is a catalyst for increased urgency about the need to accelerate climate action in tourism and to secure strong commitments to support the global goals to halve emissions over the next decade and reach Net Zero emissions as soon as possible before 2050.'*

'The Declaration unites those leading tourism's transformation around a common set of pathways for climate action, by:

- *defining a clear and consistent sector-wide message and approach to climate action in the coming decade, aligned with the wider scientific framework and urgency to act now.*
- *outlining the pathways and specific actions that will accelerate tourism's ability to transform tourism and achieve net zero as soon as possible.*
- *encouraging signatories across all sectors of tourism to demonstrate their public support for scaling up the sector's response to the climate emergency.'*

This declaration has been created as a coordinated climate action plan within the tourism sector. Signatories include government agencies, donors, financial institutions, academia, international organisations, civil society and the private sector.

Whilst many international declarations and treaties are not open to us in Wales to sign up to directly due to the nature of devolution, the Glasgow Declaration is. It is entirely possible for Wales to sign up to it.

As it stands, none of the nations of the UK have directly signed up to the declaration. We are therefore suggesting that Welsh Government sign up to this Glasgow Declaration as a way to both publicly signal intent to work with tourism providers in Wales to reduce climate emissions from the sector, but also to help stimulate further action over the next decade.

Transforming the tourism sector can only be beneficial. Existing commitments and strategies to achieve a just transition to 'net zero', are only achievable if the tourism sector also actively decarbonises, with a future emphasis on sustainability and regenerative communities, biodiversity and ecosystems.

We feel that signing up to the Glasgow Declaration would be a worthwhile and productive addition to Welsh Government's existing net zero plans and will help the tourism sector take a lead in reducing emissions. This action would again place Wales at the forefront of climate action amongst the nations of the UK.

We would support an investigation by the Climate Change, Environment and Infrastructure Committee into the issue of sustainable tourism in Wales and the multiple benefits to Wales and our planet from supporting further strong action to reduce emissions from this sector.

We would also like to mention 2 other issues that we feel need to be addressed but that aren't as yet receiving enough attention:

Opencast coal site restoration

This is of course an historic issue in Wales and as we reach the end of active coal mining in Wales, this coal site restoration issue will once again raise its head. We have seen the issues recently once again with the furore around the Ffos y Fran site.

It is an issue that is of course a concern to local communities both from a safety and landscape perspective but also potentially to the public purse in Wales depending on where restoration costs ultimately fall.

<https://www.coalaction.org.uk/2022/12/13/coal-mine-restoration/>

We would support an investigation by the Climate Change, Environment and Infrastructure Committee into this issue.

PCB (and other chemicals) land contamination

There are a number of 'legacy' sites in Wales where former factories sites or workings from the pre-devolution era have been left not fully cleaned up, resulting in chemicals being released into waterways and soil. The scale is not fully known and this is an issue across different local authority areas in Wales.

<https://caerphilly.observer/news/1020513/toxic-chemicals-found-in-community-woodland/>

We would therefore support an investigation by the Climate Change, Environment and Infrastructure Committee into the issue of chemical land contamination which would help bring to light the full situation and what can be done.

6. Other information

No response.
