

ROCP 34, WWF 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 WWF Cymru | Evidence from WWF Cymru

Priorities for the climate change, environment, and infrastructure committee

Review summer 2023

Why is the Committee reviewing its priorities?

As we enter the third year of the Sixth Senedd, the Committee is keen to review its priorities to ensure they remain relevant.

To help inform its review, the Committee is seeking views on:

- its three strategic priorities: Climate Change; Sustainable Communities: and Protecting and enhancing the natural environment; and
- its 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.

In particular, the Committee is keen to hear views on whether the above are still relevant, reflecting on social, economic and environmental developments since the priorities were set at the start of the Sixth Senedd.

The Committee would also welcome views on any other matters related to its priorities/work programme/ways of working that you consider relevant to its review.

[Submit the response via the online form](#)

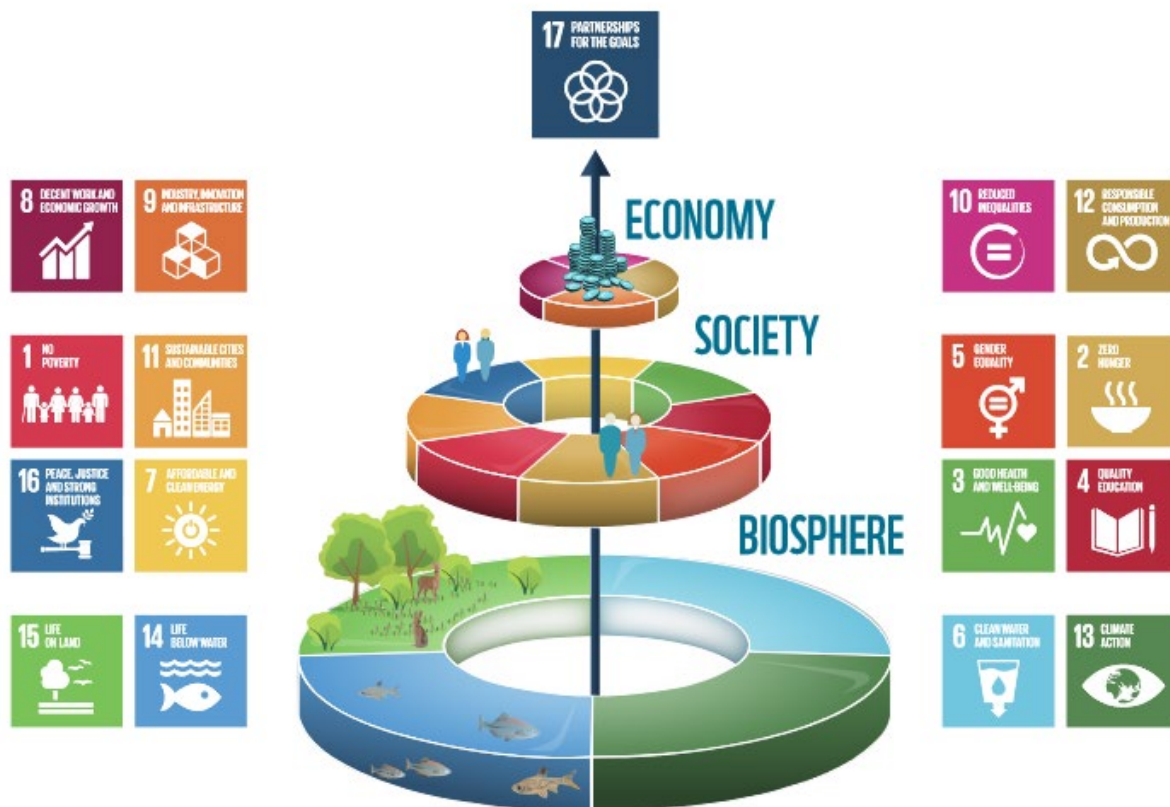
This template is available for you to draft your responses should you wish to think on your answers prior to submitting your response. responses should be submitted via the online consultation form and not be submitted via email.

4. Your opinion

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

WWF Cymru agrees that these priorities remain critical to both Wales and the work of this Committee. Climate Change continues to be the single most significant threat to our nation's future and must be a primary lens through which we assess the impact of legislative and policy/regulatory decisions. Without such a focus it will be impossible for the Committee to fully assess its wider priorities and other matters.

In making this point, and reflecting on the Committee's priorities, it is essential to recognise and embrace the interrelationships between the natural world, cultural sustainability, and wider economic development. Put simply, as illustrated below by the Stockholm Resilience Centre (Stockholm University (2016)) in relation to the United Nations' Sustainable Development Goals, our natural world is the foundation of our society, and our economy is a function of both. If we do not get our natural world in order – so that it is resilient to threats such as climate change and that human overexploitation is brought back into sustainable boundaries – then we commit ourselves to unsustainable communities, inequality and ultimately, an unsustainable economic model.



This recognition of what can be termed a sustainability hierarchy is something which the Welsh Government has been struggling to deal with since devolution began – with the Well-being of Future Generations (Wales) Act 2015 failing to sufficiently recognise it in its final form. However, since the declaration of the Nature and Climate Emergency we are beginning to see improvements, such as recognition of the above in the Explanatory Memorandum of the Agriculture (Wales) Act 2023 at WWF Cymru’s request.

Yet this recognition must go further, and we would recommend that the Committee, when considering and applying its three priorities over the remainder of the Sixth Senedd dedicates explicit attention to how this hierarchy is understood and applied to maximise benefits to people, our environment and the economy.

A final key point to make on the priorities is that ‘protecting and enhancing the natural environment’, while vitally important, appears to be based on language which predates the recent COP15: Global Biodiversity Framework to which the Welsh Government is committed. A key element of that new framework is the recognition that biodiversity “Restoration” is necessary. This is a step beyond the protection and enhancement of what remains in our heavily depleted land and seascapes. We would urge the Committee to consider raising the ambition of its language to the new international standard - as the Welsh Government appear keen to do themselves in the forthcoming Environmental Governance and Biodiversity Targets (Wales) Bill 2024.

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?

In the view of WWF Cymru these priorities are more relevant than ever. In 2023 alone we witnessed the devastating potential of climate change in the form of wildfires across the Mediterranean, Canada, and Hawaii. We have also seen the extreme heat in Asia; and the planet as a whole endured it’s hottest

July in over 150,000 years. We have already witnessed the impact of climate change on communities across Wales, and future years expose our communities and economy to greater shocks as extreme weather events become more probable with our changing climate.

In addition to ongoing extreme weather events, there is also the new landmark COP15: Global Biodiversity Framework passed last winter which provides a guide to action on Committee priority three in the context of ending the decline of nature by 2030. The Agreement includes overarching goals to protect nature, including halting human induced extinction of threatened species, and the sustainable use and management of biodiversity¹. Halting the decline of nature in Wales will also provide opportunities for us to ensure [a just transition](#) to a nature positive Net Zero economy that in turn opens up new opportunities [for green jobs](#) that provide quality, dignified work across urban and rural Wales.

When assessing the relevance of these priorities it is important to reflect the changing landscape since the Sixth Senedd began. Over the past several months, the cost-of-living crisis has been utilised as a means to question the delivery of net zero in the mainstream media and across the UK. Therefore, WWF Cymru believe the committee must meet this challenge head on, and redouble efforts to support work to address the climate and nature crises in Wales, as efforts to address these crises have significant potential to also bring down costs for people across Wales.

WWF research shows that the best way to cut through such false narratives and political opportunism is to demonstrate the money saving ability of climate and nature friendly interventions - such as sustainable renewable energy, retrofitting homes to reduce energy use, investing in a sustainable agricultural system to bring down the cost of local healthy food and deliver more quality jobs in rural areas, and developing a sustainable [food system fit for future generations](#). If the Committee intends to make the case for the relevance of its existing priorities we suggest taking this approach. As noted above, a healthy environment, our biosphere, underpins the sustainability of our society and economy. Food production in the future, for example, is underpinned by healthy soils.

Strategies to improve food security for individuals have often focused on keeping food cheap and the intensification of food production has increased to produce economies of scale. Despite this, cheap food means that the true cost of its production – pollution, biodiversity loss, ill health – are displaced elsewhere and paid for by society in the form of healthcare, water charges, income tax and insurance premiums. *The Hidden Cost of UK food* report found that for every £1 we spend on food, an extra 96.8p is spent elsewhere on costs that are not currently factored in. Unless this true cost is accounted for, this debt will continue to rise.

One of the most impactful changes the Committee could investigate over the next three years to maintain and extend its relevance within and beyond the three priorities is to focus on our food system. Food systems encompass the complex web of interactions that include the production of food, its packaging, transportation, processing, consumption and waste. Changing our food system is one of the most impactful things we can do to address climate change, nature loss, and to create healthy places and tackle social inequality. This would include, for example, addressing diet change and food waste. It would mean supporting the creation of more localised and sustainable supply chains. This would need to be with an ambition to create a contrast to Wales' current food production system which is primarily export orientated, rather than meeting our nutritional security needs within environmental limits. Therefore, we recommend the committee work with the Future Generations

Commissioner and take on a programme of work related to food to put Wales on a path of holistically addressing the cost of living, climate, and nature crises.

We know that interventions based on the food system would be popular with the public, with [our research](#) finding:

- 86% of people living in rural Wales believe farmers should make changes to support the climate,
- 96% agree farmers should make changes to support nature
- 83% of rural Wales said it is important to them that the food and drink they consume is produced in Wales
- 92% agreed the Government should spend money on creating more opportunities for farmers to sell food locally
- 90% agreed that public services that provide and sell food, such as schools and hospitals, should buy food that has been grown in Wales where possible
- 84% agreed public services that provide and sell food, such as schools and hospitals, should not buy food from sources where it may contribute to nature loss and climate change both in Wales and internationally

Furthermore, the [People's Plan for Nature](#), developed by a national conversation of over 30,000 people, and a People's Assembly for Nature of over 100 participants from across the UK, also recommends a focus on food production and consumption, farming, and global responsibility, in addition to a number of recommendations across the areas of regulation and implementation, marine protections, waterway and catchment management, local access to nature, and using evidence effectively. We recommend the committee consider the policy interventions within the report and seek to investigate how these could be applied in Wales by the Senedd and public bodies.

The People's Plan for Nature also calls for protections for the marine environment, and we echo these calls. Welsh seas cover 43% of Welsh territory, are home to an abundance of marine life and support industries, livelihoods, cultures and communities. Yet, the health of our seas is in decline and threatened from pollution, unsustainable human activity, and climate change. This threat has only increased over the last two years, as awareness is raised about pollution from our rivers and sewage systems enters our oceans. To ensure a sustainable, effective transition to net zero, to secure livelihoods, as well as ensure healthy, clean seas for people and nature, this committee must allocate time to understand how the marine environment can contribute to fighting the climate and nature emergencies.

Priority 1 – climate change:

Annual scrutiny sessions will be held with the Welsh Government to assess progress towards **delivery of policies and development of proposals in Net Zero Wales, and the impact of these on carbon emissions across sectors**. We will hold annual scrutiny sessions with the Welsh Government to assess progress towards delivery of commitments in Prosperity for All: A Climate Conscious Wales. We will continue our work on decarbonising housing. We will review the Welsh Government's 10 year National Strategy for Flood and Coastal Erosion Risk Management in Wales.

Priority 2 – Sustainable communities

A review of the Welsh Government's **circular economy strategy**, Beyond Recycling. We will assess progress against the Welsh Government's Digital strategy for Wales. We will continue our work on Renewable Energy. We will review the planning framework, including consideration of Future Wales and post-legislative scrutiny of the Planning (Wales) Act 2015. We will continue our work on modal shift and placemaking.

Priority 3 – natural environment

We will consider the Welsh Government's new arrangements for financial support for the **agriculture sector from an environmental and sustainability perspective**. We will continue to keep **marine issues, environmental governance, and statutory biodiversity targets** under review.

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)?

The Committee must scrutinise the updated Sustainable Farming Scheme when it is published later this year. At present, indications point to the initial scheme offer in 2025 being unfit for delivering adequate support to nature friendly and agroecological farmers as only the Universal tier is set to be ready. While this tier does require farmers to dedicate 10% of applicable land to woodland and semi-natural habits respectively by 2029, it is unlikely to be directly rewarding farmers for taking steps like improving soil quality and reducing artificial inputs – with instead a simple requirement to collect data.

Payments for data collection falls far short of the Welsh Government's ambition to pay for outcomes and does not support those farmers who are already well in advance of this baseline. Instead, it is likely that such farmers will have to wait several years for full versions of the Optional and Collaborative tiers to be available, and it is in these two tiers that the substantive actions for environmental (carbon and biodiversity) are likely to be placed.

Given that Wales has statutory decarbonisation targets and is currently developing biodiversity equivalents, the likelihood that its main means of delivering against such targets (in the form of the SFS) will not be doing so until close to 2030 means that the government's current approach of delaying these tiers jeopardises our wider 2030 decarbonisation and biodiversity recovery ambitions. To address this, we recommend that the committee focuses on driving government to produce a detailed assessment of its decarbonisation and biodiversity recovery expectations for all tiers of the scheme in its initial operational period (2025-2029). This will enable the Committee, and wider interested

parties, to assess the effectiveness of the SFS in these areas, and the remaining gap that needs to be filled in wider policy to obtain long term goals such as Net Zero.

Furthermore, we recommend that the Committee pushes government to set a deadline for the full operation of the Optional and Collaborative tiers no later than 24 months after the Universal tier is launched – currently expected to be in April 2025. In addition to this the Committee also needs to consider the relevant budget allocations across the three tiers. While we do not yet know the overall budget for the SFS, we can estimate that in the current economic conditions it could be as low as £200m. If the government wishes to meet its decarbonisation and biodiversity ambitions, then it will be vital that the Optional and Collaborative tiers are given adequate funding for farmers to draw upon. We cannot repeat the situation under the Common Agricultural Policy where in excess of 70% of the budget is dedicated to a basic payment for minimal actions in the Universal tier and those farmers wishing to go further cannot do so as the money in the higher tiers has run out.

There are several approaches available to government to avoid this situation – including capping payments and allocating minimal percentages of 25% of total funding to each tier. Yet in addition to the consideration of such approaches a key priority for the Committee over time should be assuring that the SFS as a whole contains a ‘ratcheting mechanism’ which drives continual improvement. This could take the form of a commitment from government that actions supported in the Optional Tier in the 2025-2029 period are intended to become part of the Universal Tier from 2030 onwards. Actions in the Optional Tier can then be made more ambitious in turn in line with attaining wider policy goals like Net Zero. This approach would continually reward those farmers who are consistently seeking to go further and deliver more value of public subsidies.

Moving beyond the SFS, autumn this year is the first opportunity for nations to [demonstrate progress towards the COP agreements](#), for both climate and nature. The committee must prioritise work which investigates whether the Welsh Government is:

- a) Translating decisions and agreements into action through the whole of government led efforts on biodiversity (National Biodiversity Strategies and Action Plans), climate (Nationally Determined Contributions), national voluntary target setting processes to achieve land degradation neutrality (LDN) and restoration of inland waters under the Freshwater Challenge, healthy and sustainable food systems as per the UN Food Systems Summit, and stopping the tipping point for fragile ecosystems of critical importance to the world, such as the Amazon, the Borneo and the Congo Basin.
- b) Increasing area-based conservation under equitable and effective governance, biodiversity inclusive and participatory spatial planning and scaling up of nature-based solutions, and;
- c) Addressing drivers of biodiversity loss, including through scaling up transformation of food and agricultural systems, forestry, fisheries, and other key economic sectors to become nature positive, which will also help to prevent future pandemics and ensure food security

Finally, there are a number of additional points the committee must take on to ensure our transition to net zero and a nature positive Wales is on track:

- Priority 1 - In analysing progress towards net zero targets, **we would strongly advise that there is strong scrutiny of agricultural emissions**. Hence why we suggest above that there is significant scrutiny of the SFS in particular. Here in Wales, current unsustainable agricultural systems have led to projections showing the sector is set to become [the largest domestic emitter of greenhouse gases \(GHG\) by around 2035](#), with its emissions having risen over the past decade, bucking the trend where other [domestic sectors’ emissions are falling](#).

- Priority 1 and 3 - We require changes to our food system to ensure that Welsh people have access to healthy, sustainable, local food, and quality, agroecological jobs which support them to stay in their communities and reduce the impact of Welsh supply chains on nature abroad and secure reductions in Welsh emissions.
- Priority 1 and 3 - Prioritise area-based protection for nature and landscape level introduction, learning from the WWF Cymru wholesale programme in Pembrokeshire which seeks to engage communities, businesses, local government, and everyone within the landscape to fight climate change by protecting nature.
- Priority 1 and 3 - **Increase scrutiny and advocacy for marine protection** to ensure that the carbon capture potential of our blue carbon habitats is taken on as soon as possible, to create jobs, store carbon, and also to ensure our early seagrass meadows are matured before 2030.
- Priority 1 – The sector focus of the Committee is welcome, we would encourage it to engage with representatives of those sectors in addition to government officials.

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?

The Committee’s priorities remain relevant; however, we believe they must be delivered at pace and co-designed (where possible) to ensure a just transition. We know the transition to a nature rich Net Zero Wales will have challenges for individuals and communities. Therefore, ensuring a just transition must be a priority for this Committee to help ensure Welsh people maintain support for implementing change. The longer we delay the less likely we are to achieve the ambitions of COP15, and the transition to Net Zero will become increasingly challenging due to the need to increase the scale and pace of delivery needed.

Having delivered the Agriculture (Wales) Act 2023, as outlined above, the Sustainable Farming Scheme must now stand up to the ambition to support Welsh farmers to deliver positive environmental and social outcomes. We know that 86% of people living in rural Wales believe farmers should make changes to support the climate, and 96% agree farmers should make changes to support nature. Therefore, it is crucial that the SFS includes impactful actions from the word go, and these are not delayed until 2029 as the Welsh Government is currently indicating.

Finally, we hope the Committee increases support for marine restoration in the next three years. Blue Carbon Habitats offer significant potential in terms of restoring biodiversity, carbon sequestration, and the creation of green jobs in rural and urban areas. However, there are considerable challenges to the success of work ongoing in these areas. WWF Cymru believe the committee must seek to investigate the barriers which are preventing us from harnessing the benefits of seaweed farming and seagrass planting for people and nature. Both of these are important interventions which could secure significant benefits for people and nature, but are facing barriers which prevent them from being implemented at scale. Coupled with the loss of 92% of our seagrass meadows over the last 100 years, Wales are missing a significant opportunity to create habitats and sequester carbon in our oceans. Therefore, we hope the committee can investigate the barriers preventing us from harnessing the full power of our seas to address the climate and nature emergencies.

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

In previous years Senedd Committees have had extended stakeholder roundtables on key issues as an addition to formal committee sessions. This was a positive way of working that we would welcome the repetition of in future.

WWF Cymru have also been keen to invite committee members to relevant site visits to better understand barriers and opportunities, but have found it difficult at times to get committee members to attend. We fully understand that committee members have had busy schedules, particularly with so much legislation being scrutinised in the first part of this current Senedd term, but we would encourage committee members to attend site visits when possible as good learning and engagement opportunities.