

## ROCP 43, Marine Conservation Society

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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 Cymdeithas Cadwraeth Forol | Evidence from Marine Conservation Society

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## 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?**

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These priorities are an accurate representation of the challenges facing Wales' natural environment. They are of course interlinked and cannot be addressed in isolation.

### **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?**

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The focus on climate change continues to be a clear priority. the latest IPCC AR6 report (<https://www.ipcc.ch/report/ar6/syr/>), released in 2023, again details the devastating impacts already happening around the world as a result of climate change, but also sets out pathways to addressing and adapting to the crisis. Part of the Welsh Government's response to the climate crisis since the beginning of this Senedd term has rightly been a rapid scaling up in the consenting and deployment of offshore renewable energy. Whilst we welcome this, it is an example of how the climate and nature emergencies are intertwined - deployment of new industry must be in harmony with nature. Indeed, the IPCC report also sets out how the climate and nature emergencies are interlinked: 'increased conservation, protection and restoration of terrestrial, coastal and ocean ecosystems, together with targeted management to adapt to unavoidable impacts of climate change reduces the vulnerability of biodiversity and ecosystem services to climate change reduces coastal erosion and flooding and could increase carbon uptake and storage if total global warming is limited.' We

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welcomed the First Minister's comments at the Marine Energy Wales Conference, noting the need to balance development with the needs of Wales' marine environment.

The State of Nature report 2023 will soon be released and confirms that Wales is one of the most nature-depleted countries in the world. Despite some progress to restore ecosystems, save species and move towards nature-friendly land and sea use, Wales' biodiversity and wider environment continues to decline and degrade. COP15 saw the adoption of the Kunming-Montreal Global Biodiversity Framework which includes measures to halt and reverse nature loss. The implementation of the Welsh Government's Biodiversity Deep Dive will be key to implementing the Framework in Wales. However, there is still much work to be done, for example with Wales being the only UK countries to still not have a permanent independent environmental oversight body in place. Against the backdrop of the UK government weakening environmental protections (<https://www.theoep.org.uk/report/proposed-changes-laws-developments-will-weaken-environmental-protections-warns-oep>), there is an opportunity for the Welsh Government to be exemplary and implement policy which matches the aspirations of the Wellbeing of Future Generations Act.

Achieving sustainable communities is key to addressing both the climate and nature crises. Although there has been a growing recognition of the value of nature, including its benefits to people's health and wellbeing (the recent public sewage discharge outcry has brought the link between public health and a healthy environment into sharp focus), the cost-of-living crisis has highlighted the fact that solutions must be made cost-effective, simple and easy for people. This must, for example, be kept in mind as the Circular Economy Strategy is reviewed. It also highlights the need for a just transition to underpin future environmental policy work.

### **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?](#))**

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#### Priority 1: Climate Change

We support the Committee's commitment to review the Welsh Government's 10-year National Strategy for Flood and Coastal Erosion Risk Management in Wales. The role of nature-based solutions should be explored within this.

We urge a continuing focus on renewable energy. We are particularly concerned about the sustainable deployment of offshore renewable energy. Renewable energy is a much-needed aspect of transitioning to a low-carbon economy, but growth in this sector must not be at the expense of Wales' unique and valuable marine environment. Marine spatial planning must be more strategic and holistic.

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Welsh Government have embarked on a two-year programme to begin this – we recommend that the scale and pace of this work should be monitored by the Committee. A continued focus on renewable energy also cuts across the Sustainable Communities theme – coastal communities will be increasingly impacted by offshore renewables as the need to improve and develop coastal infrastructure (e.g. ports, grid connections) becomes more apparent.

## 2. Sustainable Communities

We support the proposed review of the Welsh Government’s circular economy strategy. The Welsh Government’s own policies should be in line with circular economy principles - for example the Welsh Government could take a progressive stance on procurement policies, for example a reduction in products containing persistent chemicals. In addition, by supporting reuse through Wales, this would help build and support local jobs and communities. We urge the Welsh Government to support the early introduction of a Deposit Return Scheme and for no additional delays. Furthermore, infrastructure should be planned for the future economy, for example, no new incinerators should be built as future waste should have significantly reduced and investment should be therefore used to support the future just green economy.

As Wales moves to a net-zero and more nature-positive society, we urge that the principle of a just transition be kept in mind. It is good to see that this is a recognised theme underpinning the Committee’s work. We urge the Committee to take note of the work of Scotland’s Just Transition Commission. From a marine perspective, this is relevant to potential displacement of activities and livelihoods as a result of increased activity in the sea.

Connection to the natural environment is another important theme which hope will continue to underpin the Committee’s work. A greater appreciation of the benefits nature provides (wellbeing, jobs, etc.) as well as a greater appreciation of ways to help nature (through lifestyles, planning processes, political engagement etc.) are encompassed within this. The Ocean Literacy strategy being developed through the Wales Coast and Seas Partnership is a good example of work beginning in this area and could be replicated in other areas of environmental policy.

## 3. Protecting and enhancing the natural environment

We agree with the proposed focuses on marine issues, environmental governance, and statutory biodiversity targets under this priority.

Being mindful of the increasing demand for space at sea, against a backdrop of declining biodiversity, the Welsh Government must seek to readdress the balance

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of human impacts to our seas. This will require prioritisation of nature recovery in some areas, and a reduction of existing pressures if we intend to expand industries such as offshore renewables. Any impacts to existing industries, must be delivered through a fair and just transition.

We recommend that the Committee continue to focus on marine spatial planning. A Marine Development Plan could direct development to the least environmentally-sensitive areas, as well as set out the quantum of development the sea can sustain. Improved marine spatial planning will also be needed in order to safeguard vulnerable marine species and habitats and fulfil the recommendations set out in the Biodiversity Deep Dive. Although MPAs are hugely important, nature recovery is dependent on the other 70% of Welsh seas, particularly in the offshore area. A Marine Development Plan is crucial to ensuring this space for nature outside of MPAs, as well as within them. The task and finish group looking into Other Effective Conservation Measures could inform the Committee's work in this area. Welsh Government have embarked on a two-year programme to begin looking at more prescriptive spatial planning - we recommend that the scale and pace of this work should be monitored by the Committee.

On MPAs, the Welsh network still needs completing and properly protecting. The new MCZs should be progressed at pace and existing sites be brought into favourable condition. A consultation on measures informed by existing assessments from the Assessing Welsh Fisheries Activities is still required. According to NRW, the main threat to MPA condition is water quality. We urge that NRW publish any work they have done in this and convene stakeholders in a similar way to the workshops they are planning on marine litter in MPAs. In addition, work on impacts of water quality related to sewage discharges, for example persistent chemicals, should be a continued focus of the Committee, ensuring it covers both freshwater and marine.

We note that the Minister has announced her intention to appoint an external contractor to review the MPA Framework in 2024 and we hope that this work will be targeted and contribute to implementing the 30 by 30 goal in the sea. The need, and appropriateness, for areas of higher protection should be considered as part of this review. We suggest that such areas should cover 10% of the Welsh territorial area.

We urge that the Committee continues to scrutinise the Welsh Government in bringing forward an independent environmental governance body to close the environmental governance gap that has existed in Wales since the UK left the EU. This need is only highlighted further by the fact that the Independent Assessor is

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now recruiting for a Deputy and is also outsourcing some of her work to barristers. Compared to entire bodies in other UK countries, this is not good enough and fails the people of Wales from environmental, health and democratic standards points of view. A statutory oversight body could be introduced through a Nature Positive Bill (<https://waleslink.org/why-do-we-need-a-nature-positive-bill/>), which would also establish a duty on Welsh Ministers to achieve a Nature Positive Wales, implemented via a framework of legally binding nature recovery targets.

Recognising the nature finance gap, innovative investment is needed in order to deliver the actions required for nature's recovery ([Pathways-to-2030\\_-\\_Full-Report.pdf](#)). We urge that the Committee keeps abreast of work being led by the Wales Coast and Seas Partnership on developing the Wales Resilient Ecosystems Enhancement Fund. This will form solution-focused partnerships with investors and developers working in marine and coastal areas and will enable investment in long term actions to achieve clean, healthy, safe, productive and biologically diverse Welsh seas.

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**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?**

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These priorities are still relevant and have become even more urgent. We agree with the priorities identified, along with the addition of water quality. We hope that progress can be made over the next 3 years and that this Committee can leave a lasting legacy.

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

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No response.

**6. Other information**

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No response.

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