

## **HRLN 19 - Evidence from: Bat Conservation Trust**

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Senedd Cymru | Welsh Parliament

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

**Atal a gwrthdroi colli natur erbyn 2030 | Halting and reversing the loss of nature by 2030**

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### **1. Your views on the effectiveness of current policies / funds / statutory duties in halting and reversing the loss of nature by 2030.**

(We would be grateful if you could keep your answer to around 500 words).

As an organisation that works across the UK, we are glad to see the high level of ambition from the Welsh Government when it comes to biodiversity. Additionally, reports like the State of Nature 2023 for Wales have shown that previous efforts to protect bats, including legislation that protects them from disturbance, injury and death, have made a real difference, resulting in the start of a recovery of some Welsh bats compared to the 1998 baseline.

However, this isn't the full picture. Although there have been some examples of increases in abundance of some bat species in Wales, they have a long way to go before they can recover from historic declines. For instance, in the Mammal Society's Red List for Wales' Mammals, they identify Bechstein's bat as Endangered, Nathusius' pipistrelle, Serotines and Barbastelles as Vulnerable and Leisler's bat and Greater Horseshoe bats as Near Threatened in Wales. Additionally, other organisms and landscape features that bats need to thrive, like moths to eat, hedgerows to hunt from or trees to roost in, are facing very real declines or changes in their distribution which could upset the ecosystems our bat species are part of.

We are concerned that action is not being taken quickly enough to help us meet the targets by 2030. Existing policies, such as environmental planning policies, are positive but we are not yet seeing the results, which suggest that not only does their implementation need improving but also the speed of action needs increasing. Environmental policies that only kick into action when something new is being created, like new housing or new renewable energy development, fails to be truly proactive and address day-to-day actions that could deliver genuine, fast

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mainstreaming of biodiversity considerations.

Additionally, funding for environmental projects is typically very short-term, restricted in scope and often only covers capital expenditure rather than the true costs of delivery projects for nature. This limits the ability for a variety of groups and organisations to bring forward ambitious, equitable initiatives to supplement national actions.

## **2. Your views on the progress towards implementing the Biodiversity Deep Dive recommendations.**

(We would be grateful if you could keep your answer to around 500 words).

We are yet to see significant evidence of progress on meeting the recommendations.

We are particularly disappointed to note the uncertainty over the commitment to require 10% tree cover as part of the Sustainable Farming Scheme. We are disappointed that misunderstandings and miscommunications led to the undermining of targets that we see as just the first step towards more ambitious future goals. We think that requirements within agricultural payments are a powerful tool to aid biodiversity recovery and it is vital that farmers are adequately incentivised for doing so. As Wales has a particularly high land cover under agricultural uses at around 80% (Natural Resources Wales, SoNaRR2020), it is even more important that commitments such as these are not rolled back.

We are additionally concerned that ongoing and renewed pressures on National Resources Wales resourcing and capacity will lead to a reduced ability to make progress towards implementing the Deep Dive recommendations.

## **3. Your views on current arrangements for monitoring biodiversity.**

(We would be grateful if you could keep your answer to around 500 words).

There are limits to the current system of monitoring biodiversity. In Wales, a lot of biodiversity data is reliant upon third-sector and voluntary work, which we agree with the Deep Dive recommendations is a vital source of information.

We do, however, note that there are considerable data gaps in Wales that make it difficult to establish a full picture of the state of biodiversity. For instance, in the Mammal Society's Red List for Wales' Mammals, they identify Alcatraz, Whiskered

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and Brandt's bats as being Data Deficient and data on species like Leisler's bats and Barbastelle as having significant uncertainty due at least in part to a need for further monitoring. These gaps can be the result of less volunteer availability in some areas, as well as increased difficulty in monitoring some species due to their behaviours or similarity to each other, like Alcathoe, Whiskered and Brandt's bats.

These gaps could be filled with future research and new technology, including using techniques like genetic testing on droppings and environmental DNA (eDNA) to increase the certainty and coverage of some of the data. We are particularly concerned that lack of data means we cannot accurately measure the scarcity of some species, like the Barbastelle, in order to design interventions and then measure their impact or effectiveness. Rare or threatened species could benefit the most from better data.

#### **4. Your views on new approaches needed to halt and reverse the loss of nature by 2030.**

(We would be grateful if you could keep your answer to around 500 words).

We need to see a renewed sense of urgency in order to stand a chance of meeting the target. This is because although specific projects to restore habitats, for example, take time themselves to develop and roll out, it takes longer than that for species to recolonise and reestablish in the areas. This lag time means that we need urgent action now as otherwise we will not meet the target.

As well as top-down policy, we also need Government to increase support for bottom-up projects to restore nature to ensure the work is done, and in a way that can also benefit local communities in Wales. Co-designed initiatives cannot only improve take-up in local communities but also result in more ethical outcomes while we transition away from practices that harm biodiversity.

We would welcome a greater appreciation of the need for targeted species interventions and monitoring, to ensure that we are not seeking abundance at the expense of losing species diversity. This could and should be achieved at both the local and national levels, through integration of species considerations into more joined-up policymaking and collaboration between local and national public bodies as a higher priority.

We would welcome universal duties on public bodies in Wales to address the biodiversity and climate crises in their work. This would help to reduce the problem of continued support of schemes or projects that are counterproductive

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to meeting our nature targets. Additionally, this would contribute to a proportionate sense of urgency as we are rapidly running out of time to achieve the targets.

## **5. Do you have any other points you wish to raise within the scope of this inquiry?**

(We would be grateful if you could keep your answer to around 500 words).

We are concerned to hear about desires across different parties and sectors in Wales to deregulate, such as a wish to remove Nitrate Vulnerable Zones, the removal of which would affect food sources for many animals as well as water quality. We are clear that delaying improvements and undermining positive targets presents a clear barrier to meeting domestic and international biodiversity targets.

We are concerned by the suggestion that the proposed Nature Bill may only be introduced in the final year of this Senedd term, leaving very little time to actually enact it and see positive change. This is particularly the case for bat species as female bats generally only have one pup a year, so it can take multiple years to see real change at a population-level.

We cannot afford to sideline other CBD targets like the species extinction target, the pollution reduction target or the restoration of 30% of degraded ecosystems target. The species abundance target and 30% land and sea protected targets get the most attention but will not result in healthy ecosystems unless the other targets are also progressed.

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