

HRLN 26 - Evidence from: Tir Natur

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

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).

"While Welsh Government often has positive nature policies on paper, we need more substantive delivery with much more urgency and effectiveness".

This is the opening line of the Wales Environment Link 's submission to the Consultation. Tir Natur, the national Welsh rewilding charity, wholly endorses WEL's submission.

Halting and reversing the loss of nature by 2030 is a critical deadline. This date arose through agreements made at the 2022 United Nations Diversity COP 15 to effectively manage at 30% of land, freshwater and oceans for nature by 2030 along with the adoption of the Kunming-Montreal Global Biodiversity Framework.

Rewilding needs to be part of the national mix. A rewilding approach, both on land and at sea, can play a very significant role in achieving the 2030 goals. It is vital to acknowledge the importance of establishing areas where nature is set free to establish its own dynamic. We must demonstrate to the public not only what full nature restoration looks like but its ability to assist in the economic and cultural rejuvenation of the Welsh countryside.

Wales is lagging far behind other nations in the UK and Europe. Recent figures from Rewilding Britain show that rewilding projects in England and Scotland cover 45 times the area currently being rewilded in Wales. What's more, rewilding projects in the UK are producing, on average, between 200% to 400% more jobs than previously existed on the same land. Many employ even more numbers in education and tourism.

The economic benefits of rewilding flow downstream. Water retention via natural processes mitigates the risk of flooding, reducing the massive cost of building more flood defences. Water retention also helps farmers during droughts. It produces better water quality and cooler rivers which will aid the return of fish stocks, benefiting the tourist trade by reversing the recent dramatic decline in issuing angling licenses.

There are also substantial cultural benefits. Carwyn Graves' recent book *Tir* details the close connections between the Welsh language, literature and natural landscapes over the past two millennia. These links have been broken since the advent of industrial farming. Rewilding can help revive these historic connections.

In conservation terms the benefits of rewilding are not in doubt, increasing both biodiversity and bio-abundance. Rewilded sites have also brought back species which have disappeared locally and are ideal locations to establish re-introductions – at considerably less cost.

Wales is missing out on these opportunities.

We are all familiar with the reasons behind the extreme reticence to publicly entertain rewilding projects as one of the solutions to the biodiversity crisis. An ill-planned, badly implemented project led by an English charity in the Machynlleth area engendered an extreme reaction which had little to do with the scientific pros or cons of rewilding and everything to do with the populist reactions of 2016.

It is time to re-assert the many positive benefits of rewilding. It will help farmers, rural communities and assist the cultural imperative to sustain the Welsh language as well as provide many economic and conservation benefits.

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).

The Biodiversity Deep Dive's extensive recommendations are commendable with such wide-ranging initiatives from transforming protected sites, developing OECMs and national parks to reforming planning, unlocking finance and embedding nature recovery policies in local and national government. All laudable initiatives.

Yet is difficult to imagine their effective realisation with the level of funding currently available and without much clearer and precise targets. The language also displays a vagueness around the 2030 goal. What is meant to 'protect' 30% of our land for nature? Protection implies reducing or eliminating harm and yet there is nothing in the Deep Dive that directly addresses the damage that many of our industrial, farming and population activities have on the natural world. Nature doesn't just exist in our national parks, future OECMs or protected areas but is everywhere from back gardens, roadside verges and streams to our forests and fields. The damage occurs everywhere.

Oddly, many of the regulations needed to protect nature already exist. What is lacking is effective enforcement.

Examples of that are legion – like the fact that Dwy Cymru has not been held to account for its massive dumping of human waste into our rivers outside of extreme weather conditions. Or the very high levels of phosphates in the Rivers Teifi and Wye. There are many more similar examples of across Wales.

For some time NRW has been consistently underfunded and its monitoring and enforcement capacity hobbled. Take for example the sorry condition of our SSSIs (one of the protected areas that the Deep Dive wants to improve). The very latest figures which we could obtain from NRW were from 2020 and show that the condition of 49% of SSSIs were simply unknown. A further 30% were deemed to be in an unfavourable condition and 1% destroyed. How can we be confident that the good intentions of the Deep Dive will be realised when the baseline from which we start is so very low? Or that NRW does not have the capacity to enforce SSSI obligation or even the capacity to monitor these sites?

We believe that a far greater emphasis has to be placed on doing no harm to nature in the Deep Dive proposals and that means funding our enforcement agencies properly and requiring them to act decisively to enforce current legislation.

We are also concerned by the lack of a clear definition of what a particular site would have to look like to be counted as part of a qualifying site under the 30 by 30 proposals. Would it be place where nature is in balance, one free of invasive species and with all its local species thriving? What level of biodiversity standards would apply? A 1970's metric? A simple species count? Or just an improvement from a previous low baseline.

The objectives of the Deep Dive include a transformation of the protected sites so that they are bigger, better and more effectively connected (objective 1) and to develop and adapt monitoring to create an evidence framework to measure progress (objective 7). So, connectivity and monitoring (including mapping) are already identified as key. Tir Natur concurs with that view. We are particularly excited by the recognition of the need to create Nature Recovery Exemplar Areas (rewilded areas?) and OECMs although it is not at all clear what an Exemplar Area would look like? Is it just a bureaucratic fudge to avoid using the rewilding word or is it intended to stop short of the high standards of a properly rewilded site. We would argue for the highest standards of biodiversity possible within these new areas.

3. Your views on current arrangements for monitoring biodiversity.

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

Tir Natur believes that fundamentally the Biodiversity Deep Dive approach was through the wrong lens. What is needed is to be clear about what Wales should look like in 2030 and then work backwards, to see what actions are required to achieve the 30x30 goals. What we have is a long list of actions and recommendations not closely tied to the 2030 timeline with no agreement on how and when these actions need to be delivered and by whom. There is no proper assessment of what the starting point is and what does or doesn't count in an assessment of the current situation regarding biodiversity.

One of the main reasons for the collapse of nature in Wales is the destruction of links between biodiverse sites. Protected sites, land held by WTs and other environmental NGOs, even important sites within the national parks, are separated by farms, roads, industrial plant, villages and towns. The Deep Dive is right to single out connectivity as a key element but we don't see an organised plan to resolve this.

There is a lack of data on biodiversity due to inadequate monitoring, especially in the marine environment. This needs to be urgently addressed. For example, there has been an assumption that Marine Protected Areas (MPAs) in Wales will form part of the 30x30 target. The problem is that MPAs were established to protect designated features, not the whole site. A lack of data on the condition of these areas means that it is currently impossible to assess whether many MPAs can contribute to the 30x30 target. At present only 3% of MPAs have all their features in good conservation status. The lack of adequate biodiversity data for the marine environment also applies to the freshwater environment.

We need a comprehensive map of biodiversity across Wales - what connections already exist, which sites are close but cut off from other nearby sites, which areas are devoid of biodiversity? Only with a fully comprehensive baseline can we make effective decisions about where to put our limited resources.

Tir Natur is creating the Wilder Wales Network where landowners focusing on nature restoration come together to share knowledge. Every few weeks or so, another landowner contacts us. This speaks to the enthusiasm to help nature spreading through our communities. Dozens of nature organisations are also experiencing an uptake of membership. Webinars on butterflies, reptiles, mammals, meadows, flowers, plants, even fungi, are seeing large increases in attendance. Recording and monitoring techniques are often taught as part of these programmes.

This growing audience that can be tapped by a national biodiversity baseline programme devised with that mind - an inclusive system that is open and accessible to new inputs, new discoveries and future changes. To do that, Government needs to find a better way of working that is far less bureaucratic and much more flexible.

It is an enormous task which needs a national commitment and funding to match.

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).

The 8th Principle of the Deep Dive states: Embed Nature Recovery in policy and strategy in public bodies in Wales. At the moment, the Welsh Government is pursuing policies that are in direct conflict with Principle 8.

- Beavers. Stop the excessive licensing requirements to introduce beavers and set up an effective beaver damage compensation scheme for landowners.

These keystone species would substantially improve water quality and help reverse the poor state of Wales' watercourses. They reduce flooding, aid water retention during droughts and benefit hundreds of other species. The UK is at least a century behind other European states (Sweden alone has 120,000 beavers) and Wales is substantially behind both Scotland and England.

Introducing beavers is likely to have greater impact on restoring nature than any single initiative under the Deep Dive - and yet cost considerably less.

Beavers are essentially self-regulatory as they are fiercely territorial which keeps their population down and evenly distributes them across the landscape. They don't suffer population explosions.

We also know that beavers do not cause extensive damage to nearby arable fields, confining any raiding to distances of about 20 metres from a watercourse. They do impact stands of trees within a similar range but the impact is very local.

We believe that landowners should be compensated for any damage. An effective beaver compensation fund could be easily established. Its costs would pail into insignificance given the many economic benefits beavers bestow.

- Establish a Welsh Government policy on species reintroductions.

Species reintroductions, particularly those of keystone species and ecosystem engineers, are known to have significant biodiversity benefits and are being developed by many countries. The UK Government has set up a Species Reintroduction Taskforce which is an independent technical advisory group. This Taskforce brings together experts from a range of disciplines to provide evidence-led advice and guidance on existing and potential species reintroductions in England. A similar Task Force is urgently needed in Wales.

- Reduce the replanting Sika Spruce plantations.

We are pleased that broadleaf woodland plantations have recently overtaken conifer plantations in total area and would like to see this trend accelerate. Sika spruce is one of the least valuable trees for nature. This simple fact must be taken into account when the Welsh Government and NRW issue licenses for new commercial woodland plantations.

Given that tree plantations occupy land for decades such a policy would be entirely in line with the Wellbeing of Future Generations and Environment (Wales) Acts.

- Standardise the maintenance of roadside verges across the Wales.
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While some considerable progress has been made regarding the timing of the mowing of roadside verges, there is still considerable variance in local authority practices regarding the width, cutting and flailing of verges, as well as their subsequent planting.

This is an easy fix. Simply establish, through scientific evidence, the ideal maintenance regime for roadside verges and make sure it is applied across the country. This same idea could be extended to local policies on the care of trees and the management of any empty land that local councils own. It would embed nature recovery principles across all local government.

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).

Too often environmental action is perceived as an additional cost to the public purse, a cost we must bear for a better quality of life. Yet such negative attitudes ignore the very real economic opportunities that rebalancing our relationship to nature will bring. When originating conceived, rewilding techniques were not seen as adding significantly to our rural economy, be it jobs, increasing local tourism or the reduction of what are largely hidden costs. But it does.

And when you add the growing costs associated with the destruction of our biodiversity and the climate damage we are inflicting on our world, the economic benefits of immediate action for nature are manifest. We have a choice to make – act now while there is still time and reap the benefits for ourselves and generations to come or continue our destruction and pay an ever-higher price just down the road.

We need to throw off the cautious ‘let’s not upset the current powerful economic interests’ approach and make the clear and firm case that our future lies within a world where we work together with nature and natural processes for the benefit of both humanity and the natural world.
