

## **HRLN 28 - Evidence from: Butterfly Conservation**

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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).

#### **CONTINUING NATURE LOSS**

Data on nature loss in Wales shows that the existing suite of policies, statutory duties and funds are insufficient to meet 2030 targets. The latest State of Nature report reveals not only that Wales remains one of the most nature-depleted countries in the world (one in six species are threatened with extinction, for example), but that our biodiversity “continues to deteriorate”, with species abundance having decreased by 20% since 1994, including a decline of 4% in the 2010s. The increased distributions of some species do not negate declines in abundance.

Of particular concern to Butterfly Conservation is the fact that moths are the group showing the strongest decline in abundance, with a fall of 43% since 1970. A similar decline is seen in habitat specialist butterflies in Wales over recent decade (45% decline 1993 – 2019). Furthermore, both specialist and wider countryside butterfly species have declined in distribution in Wales over recent decades.

To reverse these declines, particularly those of habitat specialist species, policies need a renewed focus on habitat heterogeneity – a diversity of habitats within a landscape (a ‘habitat mosaic’), and the creation and preservation structurally diverse habitats. This requires both landscape-scale recovery (covered mostly in subsequent questions) and species-specific interventions to be prioritised in policy decisions.

Butterfly Conservation run projects protecting over a hundred threatened species, and are involved in managing hundreds of sites. This experience has shown us that targeted interventions can and do arrest and reverse declines in individual species or populations.

Although more funding is crucial (see below), current levels of project funding could do more for species if a greater emphasis was placed on the species intervention aspects of projects, and less emphasis placed on community involvement. Whilst we support the idea of community involvement and strive to include this in our projects as much as possible, for some sites it is impractical. Funding bids for such sites are currently less likely to be successful, putting vulnerable butterfly and moth populations at risk.

For some species, the most effective interventions could be achieved through policy changes, rather than funding uplifts. For example, a change in hedgerow management policy (e.g. delivered through the Sustainable Farming Scheme (SFS)) could have significant benefits for one of Wales' most vulnerable butterfly species, the Brown Hairstreak. Compared to other parts of the UK, this species is faring poorly in Wales. Its declines can be mostly attributed to annual hedgerow trimming in its population areas – this trimming removes both eggs and food for caterpillars. Reducing the frequency of hedgerow trimming, and encouraging trimming later in winter, could have enormous benefits for this species.

Similarly, many vulnerable species such as Marsh Fritillary, Small Blue, and Grayling would benefit from changes in grazing regimes on farms, something which could be delivered within existing funding levels.

We offer further advice on future policy goals for butterflies and moths in subsequent questions.

## FUNDING

Multiple economic assessments clearly demonstrate a significant underfunding of relevant policies and bodies. There are several estimates for the additional funding required for Welsh Government to meet its nature commitments, but the figure is likely in the hundreds of millions.

Whilst the increase in funding required is significant, it is both necessary and sustainable in the long term – evidence points to significant returns on investment in biodiversity across society, including individual species restoration projects. Furthermore, failure to address nature loss will likely lead to significant economic turmoil in the long-term, possibly dwarfing the economics losses suffered during the 2008 financial crash and the COVID pandemic.

## **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).

Wales' protected sites are crucial for protecting some of the most vulnerable species, as well as meeting out 30x30 target, but we are currently lacking in both

quantity and quality of sites.

Welsh Government could make significant inroads towards 30x30 by progressing work on designating OECMs. Currently, only six designation types in Wales meet IUCN criteria for counting towards 30x30. However, many more individual sites could be considered on a case-by-case basis as OECMs, including eNGO land such as Butterfly Conservation's nature reserves .

Funding will be required to bring some of these sites up to IUCN standards with regards to long-term management and site quality. The relative dearth of government funding for eNGOs is a barrier, however.

Welsh Government should also progress amending Designated Landscape legislation to reprioritise nature recovery within these areas. While the areas in their entirety are unlikely to meet IUCN criteria, this would still increase the area that does count towards the target.

The protected sites series is also failing in terms of being “better”. The Global Biodiversity Framework and IUCN criteria are clear that quality is as important as quantity when it comes to protected sites. See Question 3 for comments on monitoring protected sites.

We must not lose sight of the reason for our 30x30 target: it is a means, not an end. In terms of halting and reversing nature loss, it is not enough merely to have 30% land protected for nature – this land must be in adequate condition to do so, else the Government risks creating ‘paper parks’ that do little to halt and reverse the decline of nature.

Regarding the recommendation “Investing in skilled advisors to engage farmers with the new scheme and maximise the potential benefits for nature”, progress so far has extremely poor. Given how critical agriculture is to halting and reversing nature loss, this is deeply concerning. The launch of the SFS consultation in December 2023 was blighted communication issues. The misunderstanding arising from this led to misplaced worries and backlash against the parts of the Scheme with the greatest potential to deliver positive biodiversity outcomes, especially the 10% rules.

A common complaint from farmers was that the 10% rules would see 20% of their land taken out of production. In reality, the management of many of the habitats under the 10% habitats rule is conducive to both sustainable agriculture and profitable farm businesses. We highlighted in Question 1 how grazing scheme can be a significant part of vulnerable species protection.

Similarly, the integration of trees into farming systems has many potential benefits from a farm business perspective, such as protecting and improving the productivity of stock . A renewed effort must be made to communicate the

benefits of on-farm nature to farmers, including working with Nature-friendly Farming Network.

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

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

Currently, only about half of Wales' protected sites have an accurate, up to date condition assessment. Many sites lack the data for such an assessment to be carried out. Of those that are assessed, only 20% are in favourable condition, and there is an ongoing decline of nature within our protected sites series .

Government policy could be amended in two significant ways to rectify these monitoring and condition issues. Firstly, reprioritising funding to allow NRW and other relevant bodies to monitor and manage sites (e.g. see Question 1). Secondly, by introducing cross-cutting national policy to mandate long-term management plans for all protected sites. Such a policy could bring about collaboration on monitoring and management between land managers, farmers, local governments, NGOs and NRW, supported by well-resourced Local Nature Partnerships.

NRW have reported that they are under-resourced to ensure compliance with existing legislation (let alone ensure compliance with further legislation). For policies to have their intended impact and for Government to reach its 2030 targets, these resourcing issues must be resolved as a matter of urgency.

The current absence of an independent environmental governance body, with adequate resources and enforcement powers (something the Interim Assessor lacks) further hampers compliance with existing legislation. We welcome the potential resolution of this issue via the Environmental Principles Bill, but stress again the importance of adequately resourcing this post.

### **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).

Butterfly Conservation was a signatory to the Wales Environment Link 'Pathways' report, which should be considered as part of our response to this question. We will briefly detail some areas of particular importance below.

In-line with our comments in Question 1, creating and preserving habitat heterogeneity is crucial to reversing nature loss, and targeted species interventions are often required for the most vulnerable species. There is enormous potential for the agriculture sector to deliver on both these areas, with

farmland accounting for 90% of Wales' land area.

The State of Nature report is clear about the importance of agriculture: agricultural intensification is the most significant driver of species declines; therefore nature restoration must be a "core objective" of the SFS. We are concerned with the risk of the Scheme being diluted in this regard. Whilst we appreciate the ongoing roundtable work being done by the Government, the final Universal layer must be an improvement on the current state.

Many farms, particularly upland farms, already meet most or all the proposed Universal requirements – such as tree and habitat cover – therefore the Universal layer risks doing very little to improve the state of nature on Welsh farms. If the Universal layer is to be less ambitious in terms of delivering for nature, it is vital that more funding is allocated instead to the Optional and Collaborative layers of the Scheme in order to improve biodiversity outcomes on Welsh farms.

The Glastir Monitoring and Evaluation Programme (GMEP) shows that AESs can and do have a positive impact on biodiversity, although a lack of long-term planning and relatively low take-up risks undoing some gains and places a glass ceiling on how much AESs can achieve.

A new policy that is needed is a national land-use strategy, to ensure competing land-use priorities do not create delivery gaps through which our most vulnerable species and habitat fall. Whilst the Environmental Principles Bill could go some way to addressing these concerns, even 'nature-positive' decisions taken by different sectors do not guarantee specific species or habitats will be targeted. A national, cross-sector strategy could also help deliver the habitat mosaics across landscapes that are so important to nature conservation and restoration, by ensuring that habitat creation decisions are taken at a landscape scale, rather than risking the same habitat creation options being undertaken by sectors working in isolation.

Such a strategy would also be important with regards to delivering better connected protected sites, as recommended by the Biodiversity Deep Dive, by mandating and coordinating habitat connectivity. This could be hugely beneficial for some of the country's most vulnerable species, which often persist in small, isolated populations. For example, Marsh Fritillary, which has notably volatile populations, prone to significant fluctuations year-to-year. This leaves the species vulnerable to local extinctions in bad years. Consequently, it is particularly important that their habitat areas are connected, allowing them to take advantage of good years by colonising new areas, thereby preserving the species in a landscape.

A new policy area Welsh Government should consider is light pollution. Excess artificial light at night (ALAN) has been shown to have serious detrimental effects on many invertebrate species in myriad ways, including moths. The issue of

excess ALAN could be rectified through mapping and planning actions, following the example of other countries that have taken steps to tackle this issue .

## **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).

Whilst a lot of Government focus will understandably be on achieving 30x30 targets, reversing nature loss is unlikely to be achieved solely through protected sites, even with significant improvements in their condition. Indeed, the land surrounding protected sites may be a significant factor on the condition and success of protected sites. The other 70% of our land must play a role in halting and reversing nature loss, reflecting the pervasiveness of the effects of nature loss and the potential benefits from nature restoration on many areas of society. For example, increasing urban biodiversity can aid in carbon sequestration, cooling local climate and reduce the urban heat island effect , improve air quality , benefit the physiological and psychological health of humans .

Furthermore, the condition of protected sites is often at risk due to 'spillover' effects from outside. For example, increased agricultural intensification surrounding protected sites lead to less favourable conditions within the protected site. In-line with our previous comments on ensuring protected sites are of sufficient quality, it is equally important that areas outside of protected sites are governed in a nature-positive away, else we risk seeing a continuation of the trend of nature declining even within protected sites.

Welsh Government must also address the grassland policy gap. Compared to other comparably extensive habitats, such as woodlands and peatlands, grasslands are not covered by bespoke policies, nor do they receive the same level of political attention. Whereas woodlands and peatlands both have national strategies, the only national grassland strategy is restricted to managing the country's road verges.

This is an unacceptable outcome when grasslands cover 65% of Wales' land area, a higher proportion than in any other UK nation. Species-rich grasslands, so important for so many species, cover nearly a quarter of Wales' land area .

Grasslands are vitally important habitats for hundreds of species, including many of Wales' priority butterfly and moth species. Furthermore, grasslands deliver enormous benefits to wider society, including carbon sequestration potential comparable with woodlands, including flood resilience, and water regulation<sup>21</sup>. However, Wales has lost significant amounts of grassland over the last century – 90% of lowland grasslands, for example .

Welsh Government should create a register of ancient and species-rich grasslands

as the first stage in their protection – we cannot protect that which we do not know about. The Government must also create a national plan to protect, restore and expand species-rich grasslands, similar to the woodland creation targets. The Government must also progress the recommendations made by NRW's 2020 report on managing and enhancing grasslands in and outside of protected sites<sup>22</sup>, and targeting the creation of new grasslands and the linking together of existing grasslands.